1		IN THE UNITED STATES DISTRICT COURT
2		WESTERN DISTRICT OF VIRGINIA
3		ROANOKE DIVISION
4		
5		
6	BRIAN SCOTT DU	
7	BRIAN SCOIL DO	)
0		Plaintiff )
8	-vs-	) CASE NO.: ) 7:14cv00429
9	SHERIFF MORGAN	,
10		Defendant )
11		
12		
13		
14		
15	DEPOSITION OF:	CHRISTINE LINK-OWENS
16		
17	DATE:	APRIL 10, 2015 (Friday)
18	TIME:	11:15 a.m.
19	LOCATION:	Giles County Administration Building 315 North Main Street
20		Pearisburg, Virginia 24134
21		
22	REPORTER:	Lisa M. Hooker, RPR Registered Professional Reporter #29505
23		TOST SOLICE TESTES TOTAL REPORTED #27505
24		

## BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS **Christine Link-Owens on 04/10/2015**

## **Pages 2..5**

				s on 04/10/2015 Pages 2
1	I N D E X	Page 2	1	Page 4  CHRISTINE M. LINK-OWENS
2			2	having been sworn by the Registered Professional Reporter,
3	EXAMINATION BY:	PAGE	3	Lisa M. Hooker, to tell the truth, the whole truth, and
4	Thomas E. Strelka, Esq.	4	4	nothing but the truth, testified as follows:
5	Jim H. Guynn, Jr., Esq.	65	5	nothing but the truth, testified as follows.
6	- · · · · · -		6	EXAMINATION BY THOMAS E. STRELKA, ESQ.
7	Appearance Page	3	7	Q. Good morning, ma'am.
8	Exhibit Page		8	A. Good morning.
9	Witness Signature Page		9	Q. As I indicated to you earlier, I'm Tommy
10	Witness Signature Waiver		10	Strelka and I represent Mr. Dunn, and here you are in a
11	Reporter's Certificate		11	deposition. Have you ever been deposed before?
12	Errata Sheet			
13	Biraca Sheet		12	
14			13	Q. Okay, and it's really easy. You don't win
15			14	it, you don't lose it; you just get through it and go
			15	home, okay?
16 17			16	A. All right.
18			17	Q. Okay, and I'm going to ask you questions
19			18	and you just provide truthful answers; that is all that
20			19	you have to do.
21			20	A. All right.
22			21	Q. Two little ground rules. Our lovely court
23			22	reporter can only type up what one person is saying at a
24			23	time, so please wait to respond until I'm completely done
24			24	speaking.
		Page 3		Page 5
1 2	A P P E A R A N C E S FOR THE PLAINTIFF: STRELKA LAW OFFICE, PC		1	A. Okay.
3	Attorneys at Law 119 Norfolk Avenue, SW		2	Q. And the other thing is, if I ask you a yes
	Suite 330		3	or no question, I would ask that you verbally respond with
4 5	Roanoke, Virginia 24011 (540) 283-0802		4	a yes or no and try to stay away from the dreaded huh-huh
6	(no fax available) thomas@strelkalaw.com		5	and the hmm-hmm's, okay?
7	BY: THOMAS E. STRELKA, ESQ.		6	A. Okay.
8	FOR THE DEFENDANT: GUYNN and WADDELL, PC		7	Q. And state your full legal name, please.
10	Attorneys at Law		8	A. Christine Marie Link-Owens.
10	415 South College Avenue Salem, Virginia 24153		9	Q. All right, Ms. Link-Owens, and where are
11	(540) 387-2320		10	you currently employed?
12	(540) 389-2350		11	A. At Virginia Tech, Transportation
13	jim.guynn@gmdlawfirm.com		12	Institute.
14	BY: JIM H. GUYNN, JR., ESQ.		13	Q. Okay, and you are also affiliated with an
	ALSO PRESENT: Brian Scott Dunn		14	organization previously known as the Giles County Animal
15 16	Morgan Millirons		15	Rescue; is that right?
	EXHIBITS		16	A. Yes.
17	NUMBER DESCRIPTION	PAGE	17	Q. And now it's known as the Giles Animal
18	Exhibit 42 Letter dated 2-6-11.	16	18	Rescue?
19	Exhibit 43 Email Chain.	31	19	A. Yes.
20	Exhibit 44 Email Chain. Exhibit 45 Email from Link to Helsel.	34 46	20	Q. And what services does that organization
21	Exhibit 46 Email from Link to Helsel. Exhibit 47 Email from Link to Helsel.	49 51	21	provide?
	Exhibit 48 Email from Link to McKlarney.	54	22	A. It was founded in 1999 to primarily address
22	Exhibit 49 Copies of Photographs. Exhibit 50 Email from Link to Helsel.	59 63	23	shelter issues, to help a County become compliant with
23	Total Bills to herber.	03	24	shelter regulations, and to raise awareness in the
24				-

Pages 6 9

	Christine Link-Owens on 04/10/2015 Pages 69			
	Page 6		Page 8	
1	community about overpopulation, that there is a shelter	1	were prevented access to the shelter in 2013?	
2	and pets need to be adopted, encouraging adoption,	2	A. Correct.	
3	encouraging spay and neuter, and animal welfare issues	3	Q. Okay, prior to that happening, can you give	
4	within the County, and but primarily, it was actually	4	me a sense of how often volunteers would be at the	
5	starting to help improve shelter conditions and adoption	5	shelter?	
6	rates.	6	A. Any time that we could find volunteers	
7	Q. Okay.	7	willing to go, we were given basically free reign that we	
8	A. At that time, in 1999, and we still are	8	could go any time, day or night. We could go and get a	
9	doing the same work.	9	key. Some volunteers had keys of their own, and then some	
10	Q. Okay.	10	volunteers were asked to go and to check out a key from	
11	A. And we are incorporated.	11	the sheriff's department at the dispatch office.	
12	Q. And you are the president of this	12	Q. Okay.	
13	organization?	13	A. And I believe that it was in 2012, we had	
14	A. I was for the past four years. I have	14	so many volunteers and we had run into some issues where	
15	stepped back as of January 1 of 2015, and I am now still	15	sometimes the key would not be available when we would go	
16	very active in the volunteerism and rescue coordinator	16	to dispatch; for instance, one time they had loaned that	
17	still.	17	particular key to a person who was supposed it was not	
18	Q. You were the president in 2013; is that	18	one of our volunteers, not a volunteer situation; it was	
19	right?	19	someone that needed to do repairs to the shelter, and I	
20	A. Yes.	20	can't remember the exact situation, but the key was not	
21	Q. Okay, and did did in 2013, did your	21	available when we went to get a key and we really needed	
22	organization facilitate volunteers working at the shelter	22	to get to a shelter to pull an animal to get it to a vet,	
23	in Giles?	23	so after that incident, we asked the animal control	
24	A. Yes.	24	officer if we could use a real estate lock box and hang on	
	Page 7		Page 9	
1	Q. Okay.	1	the gate, and only certain volunteers, not even all	
2	A. Since 1999, when we first started this	2	volunteers but certain volunteers would use this code and	
3	organization, the County has allowed volunteers to come to	3	open up the lock box and get the key, so therefore we	
4	the shelter to help keep the shelter open hours for the	4	could bypass having to go and check out a key and the	
5	public.	5	people would not need to have a personal copy of the key,	
6	Q. Okay.	6	that we could just use one shared key, and the only person	
7	A. Because before that, there really was not	7	that would need it at the time would be the one at the	
8	set open hours; therefore, the therefore, it is very	8	shelter and then they would put it back in the lock box	
9	unlikely that adoptions can occur if the public cannot	9	when they left, and that was actually very helpful. The	
10	come out there, so yes, one of our primary duties was to	10	volunteers actually volunteered more once we started that,	
11	hold open hours so that the public could come and	11	having that process, because it made their time, which was	
12	hopefully adopt or reclaim animals. When we the more	12	so valuable already and they only had an hour window, and	
13	involved we became, the higher reclaims; the reclaim rate	13	it saved may save the volunteer that extra 30 minutes	
14	actually also went up when people were able to come up and	14	of having to drive all the way from dispatch to the	
15	say, oh, yes, my pet is here and we were able to reclaim	15	shelter which was already a long drive for people anyway,	
16	them, and then we also do what we can to pull animals and	16	so that was a great system; it was great that the animal	
17	send them to rescues and other facilities where there is a	17	control officer allowed us to do that, but however the	
18	no kill situation to avoid euthanasia, because at the	18	complaints arose that volunteers were there too much, I'm	
19	pound, of course, they can only keep the pets for a	19	not sure how that could be a problem.	
20	certain period of time and then they have to make a	20	Q. Let me pause you there, if that is okay.	
21	decision to euthanize if no one comes to adopt or claim	21	A. Okay.	
22	them, so we are very active and were, actually, until	22	Q. Thank you; you are doing great, but how are	
23	2013.	23	you aware of any complaints about volunteers being there	
24	Q. Okay. And at some point, the volunteers	24	too much?	
" "	2. Simi. This de boile potitie, the votunteets	""	555 MAGAI	

1				
	Α.	Page 10 Well, we asked the Sheriff for a meeting so	1	Page 12 Q. Okay.
2		uss some problems that we had found at the	2	A. But this is when I became president, so
3	shelter.	ass some problems that we had round at the	3	this is what I
4	Q.	Okay. Do you recall do you recall what	4	MR. STRELKA: I don't know if I have a copy
5	-	are talking about right now?	5	of this, because this is earlier than the other
6	A.	In the spring.	6	things that we do you mind if we enter this as
7	Q.	Okay of 2013?	7	an Exhibit?
8	Α.	Yes.	8	MR. GUYNN: Well, I think that we ought to
9	Q.	Okay.	9	make copies of it.
10	Α.	Probably, I mean, we started requesting	10	THE WITNESS: You can have that one.
11	meetings in F		11	MR. STRELKA: We'll make copies of
12	Q.	Okay.	12	everything before we go.
13	Α.	Of that year.	13	MR. GUYNN: Well, we will need one for all
14	Q.	And how would you request a meeting with	14	of us during the deposition.
15	the Sheriff?	The north four requests a moderning first	15	MR. STRELKA: Sure, go and get some copies
16	Α.	Actually, technically in February of 2011,	16	of that.
17		red a letter to the Sheriff outlining	17	BY MR. STRELKA:
18	problems.	200 0 20002 00 000 2002222 00022023	18	Q. While he is getting copies, I will go to a
19	Q.	Okay.	19	different area of questioning real quick if that is all
20	Α.	And so those same problems that we brought	20	right. Prior to there being limited access to volunteers
21		imes, beginning in 2011 through 2013.	21	at the shelter, I think that you've outlined how you would
22	Q.	Okay, and after you hand delivered this	22	go and get the key and get access to the shelter, where
23	-	ruary of 2011 to the Sheriff, did he ever	23	was the food stored at the shelter to feed the animals?
24	respond to th	-	24	A. There is one room in the shelter where food
	-			
1	Δ	Page 11	1	Page 13
1 2	Α.	No.	1 2	was stored. Well, actually, there were one room where
2	Q.	No.  Did you ever have a meeting with him?	2	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats;
2 3	Q. A.	No.  Did you ever have a meeting with him?  No.	2	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats,
2 3 4	Q. A. Q.	No.  Did you ever have a meeting with him?  No.  He never called you?	2 3 4	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.
2 3 4 5	Q. A. Q. A.	No.  Did you ever have a meeting with him?  No.  He never called you?  No.	2 3 4 5	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.
2 3 4 5 6	Q. A. Q. A. Q.	No.  Did you ever have a meeting with him?  No.  He never called you?  No.  Okay. And any and I think that you said	2 3 4 5 6	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than
2 3 4 5 6	Q. A. Q. A. Q. again in, wha	No.  Did you ever have a meeting with him?  No.  He never called you?  No.	2 3 4 5 6 7	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying
2 3 4 5 6 7 8	Q. A. Q. A. Q. again in, wha	No. Did you ever have a meeting with him? No. He never called you? No. Okay. And any and I think that you said t was it, January of 2013, or when was your	2 3 4 5 6 7 8	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and
2 3 4 5 6 7 8	Q. A. Q. A. Q. again in, wha	No. Did you ever have a meeting with him? No. He never called you? No. Okay. And any and I think that you said t was it, January of 2013, or when was your At least February of 2013, we started I	2 3 4 5 6 7 8	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and so that I mean, as far as the time frame, that was in
2 3 4 5 6 7 8 9	Q. A. Q. A. Q. again in, wha	No. Did you ever have a meeting with him? No. He never called you? No. Okay. And any and I think that you said t was it, January of 2013, or when was your At least February of 2013, we started I continually trying to keep bringing those	2 3 4 5 6 7 8 9	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and so that I mean, as far as the time frame, that was in 2012 that this began, and often times, our volunteers were
2 3 4 5 6 7 8 9 10	Q. A. Q. A. Q. again in, wha next A. mean, we were same problems	No.  Did you ever have a meeting with him?  No.  He never called you?  No.  Okay. And any and I think that you said t was it, January of 2013, or when was your  At least February of 2013, we started I continually trying to keep bringing those that were in the initial letter in 2011. We	2 3 4 5 6 7 8 9 10 11	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and so that I mean, as far as the time frame, that was in 2012 that this began, and often times, our volunteers were the only people there for the day, so we would feed the
2 3 4 5 6 7 8 9 10 11 12	Q. A. Q. A. Q. again in, wha next A. mean, we were same problems	No. Did you ever have a meeting with him? No. He never called you? No. Okay. And any and I think that you said t was it, January of 2013, or when was your At least February of 2013, we started I continually trying to keep bringing those	2 3 4 5 6 7 8 9 10 11 12	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and so that I mean, as far as the time frame, that was in 2012 that this began, and often times, our volunteers were the only people there for the day, so we would feed the animals if we knew that we needed to, because staff had
2 3 4 5 6 7 8 9 10 11 12 13	Q. A. Q. A. Q. again in, whather the continued per addressed.	No.  Did you ever have a meeting with him?  No.  He never called you?  No.  Okay. And any and I think that you said t was it, January of 2013, or when was your  At least February of 2013, we started I continually trying to keep bringing those that were in the initial letter in 2011. We iodically trying to get those problems	2 3 4 5 6 7 8 9 10 11	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and so that I mean, as far as the time frame, that was in 2012 that this began, and often times, our volunteers were the only people there for the day, so we would feed the animals if we knew that we needed to, because staff had the day off, and or if we had it was commonplace
2 3 4 5 6 7 8 9 10 11 12 13	Q. A. Q. A. Q. again in, whather the continued per addressed. Q.	No.  Did you ever have a meeting with him?  No.  He never called you?  No.  Okay. And any and I think that you said t was it, January of 2013, or when was your  At least February of 2013, we started I continually trying to keep bringing those that were in the initial letter in 2011. We iodically trying to get those problems  Okay. And sitting here today, without the	2 3 4 5 6 7 8 9 10 11 12 13 14	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and so that I mean, as far as the time frame, that was in 2012 that this began, and often times, our volunteers were the only people there for the day, so we would feed the animals if we knew that we needed to, because staff had the day off, and or if we had it was commonplace that animals would be surrendered while we were there, and
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. A. Q. A. Q. again in, what next A. mean, we were same problems continued per addressed. Q. letter here i	No.  Did you ever have a meeting with him?  No.  He never called you?  No.  Okay. And any and I think that you said t was it, January of 2013, or when was your  At least February of 2013, we started I continually trying to keep bringing those that were in the initial letter in 2011. We iodically trying to get those problems  Okay. And sitting here today, without the in front of you, and I have some documentation	2 3 4 5 6 7 8 9 10 11 12 13 14 15	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and so that I mean, as far as the time frame, that was in 2012 that this began, and often times, our volunteers were the only people there for the day, so we would feed the animals if we knew that we needed to, because staff had the day off, and or if we had it was commonplace that animals would be surrendered while we were there, and sometimes those animals looked starved and we would want
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. A. Q. A. Q. again in, what next A. mean, we were same problems continued per addressed. Q. letter here i that we can g	No.  Did you ever have a meeting with him?  No.  He never called you?  No.  Okay. And any and I think that you said t was it, January of 2013, or when was your  At least February of 2013, we started I continually trying to keep bringing those that were in the initial letter in 2011. We iodically trying to get those problems  Okay. And sitting here today, without the in front of you, and I have some documentation through in a minute, what were some of the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and so that I mean, as far as the time frame, that was in 2012 that this began, and often times, our volunteers were the only people there for the day, so we would feed the animals if we knew that we needed to, because staff had the day off, and or if we had it was commonplace that animals would be surrendered while we were there, and sometimes those animals looked starved and we would want to give them a bowl of food, so that did become an issue
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A. Q. A. Q. again in, wha next A. mean, we were same problems continued per addressed. Q. letter here i that we can g issues that y A.	No.  Did you ever have a meeting with him?  No.  He never called you?  No.  Okay. And any and I think that you said t was it, January of 2013, or when was your  At least February of 2013, we started I continually trying to keep bringing those that were in the initial letter in 2011. We iodically trying to get those problems  Okay. And sitting here today, without the in front of you, and I have some documentation to through in a minute, what were some of the ou remember?  Do you want to see a copy of it?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and so that I mean, as far as the time frame, that was in 2012 that this began, and often times, our volunteers were the only people there for the day, so we would feed the animals if we knew that we needed to, because staff had the day off, and or if we had it was commonplace that animals would be surrendered while we were there, and sometimes those animals looked starved and we would want to give them a bowl of food, so that did become an issue when the food was staying locked. We were told so when we asked, why is the food room locked, he said it was
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A. Q. A. Q. again in, what next A. mean, we were same problems continued per addressed. Q. letter here i that we can g issues that y A. Q.	No.  Did you ever have a meeting with him?  No.  He never called you?  No.  Okay. And any and I think that you said t was it, January of 2013, or when was your  At least February of 2013, we started I continually trying to keep bringing those that were in the initial letter in 2011. We iodically trying to get those problems  Okay. And sitting here today, without the in front of you, and I have some documentation to through in a minute, what were some of the ou remember?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and so that I mean, as far as the time frame, that was in 2012 that this began, and often times, our volunteers were the only people there for the day, so we would feed the animals if we knew that we needed to, because staff had the day off, and or if we had it was commonplace that animals would be surrendered while we were there, and sometimes those animals looked starved and we would want to give them a bowl of food, so that did become an issue when the food was staying locked. We were told so when we asked, why is the food room locked, he said it was because food was disappearing.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A. Q. A. Q. again in, whather the continued per addressed. Q. letter here in that we can go issues that yellow. A. Q. it.	No.  Did you ever have a meeting with him?  No.  He never called you?  No.  Okay. And any and I think that you said t was it, January of 2013, or when was your  At least February of 2013, we started I continually trying to keep bringing those that were in the initial letter in 2011. We iodically trying to get those problems  Okay. And sitting here today, without the in front of you, and I have some documentation to through in a minute, what were some of the ou remember?  Do you want to see a copy of it?  Yes, sure, bring it out. I probably have	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and so that I mean, as far as the time frame, that was in 2012 that this began, and often times, our volunteers were the only people there for the day, so we would feed the animals if we knew that we needed to, because staff had the day off, and or if we had it was commonplace that animals would be surrendered while we were there, and sometimes those animals looked starved and we would want to give them a bowl of food, so that did become an issue when the food was staying locked. We were told so when we asked, why is the food room locked, he said it was because food was disappearing.  Q. And who told you that?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A. Q. A. Q. again in, wha next A. mean, we were same problems continued per addressed. Q. letter here i that we can g issues that y A. Q. it. A.	No.  Did you ever have a meeting with him?  No.  He never called you?  No.  Okay. And any and I think that you said t was it, January of 2013, or when was your  At least February of 2013, we started I continually trying to keep bringing those that were in the initial letter in 2011. We iodically trying to get those problems  Okay. And sitting here today, without the in front of you, and I have some documentation to through in a minute, what were some of the ou remember?  Do you want to see a copy of it?  Yes, sure, bring it out. I probably have	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and so that I mean, as far as the time frame, that was in 2012 that this began, and often times, our volunteers were the only people there for the day, so we would feed the animals if we knew that we needed to, because staff had the day off, and or if we had it was commonplace that animals would be surrendered while we were there, and sometimes those animals looked starved and we would want to give them a bowl of food, so that did become an issue when the food was staying locked. We were told so when we asked, why is the food room locked, he said it was because food was disappearing.  Q. And who told you that?  A. The animal control officer told volunteers
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A. Q. A. Q. again in, wha next A. mean, we were same problems continued per addressed. Q. letter here i that we can g issues that y A. Q. it. A. and even prior	No.  Did you ever have a meeting with him?  No.  He never called you?  No.  Okay. And any and I think that you said t was it, January of 2013, or when was your  At least February of 2013, we started I continually trying to keep bringing those that were in the initial letter in 2011. We iodically trying to get those problems  Okay. And sitting here today, without the in front of you, and I have some documentation to through in a minute, what were some of the ou remember?  Do you want to see a copy of it?  Yes, sure, bring it out. I probably have  So this is a copy of the letter, the first, in to this document, the president before me	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and so that I mean, as far as the time frame, that was in 2012 that this began, and often times, our volunteers were the only people there for the day, so we would feed the animals if we knew that we needed to, because staff had the day off, and or if we had it was commonplace that animals would be surrendered while we were there, and sometimes those animals looked starved and we would want to give them a bowl of food, so that did become an issue when the food was staying locked. We were told so when we asked, why is the food room locked, he said it was because food was disappearing.  Q. And who told you that?  A. The animal control officer told volunteers who asked.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A. Q. A. Q. again in, wha next A. mean, we were same problems continued per addressed. Q. letter here i that we can g issues that y A. Q. it. A. and even prior	No.  Did you ever have a meeting with him?  No.  He never called you?  No.  Okay. And any and I think that you said t was it, January of 2013, or when was your  At least February of 2013, we started I continually trying to keep bringing those that were in the initial letter in 2011. We iodically trying to get those problems  Okay. And sitting here today, without the in front of you, and I have some documentation to through in a minute, what were some of the ou remember?  Do you want to see a copy of it?  Yes, sure, bring it out. I probably have	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	was stored. Well, actually, there were one room where primarily most of the food was stored but for cats; sometimes they would have food in another room for cats, and that room was rarely locked.  Q. Okay.  A. I don't know all of the details, other than people kept volunteers kept coming to know and saying when we went to the shelter, the food room was locked, and so that I mean, as far as the time frame, that was in 2012 that this began, and often times, our volunteers were the only people there for the day, so we would feed the animals if we knew that we needed to, because staff had the day off, and or if we had it was commonplace that animals would be surrendered while we were there, and sometimes those animals looked starved and we would want to give them a bowl of food, so that did become an issue when the food was staying locked. We were told so when we asked, why is the food room locked, he said it was because food was disappearing.  Q. And who told you that?  A. The animal control officer told volunteers

	Christine Link-Ov	ven	s on 04/10/2015 Pages 1417
	Page 14		Page 16
	but at one of the meetings with the Sheriff, he stated	1	years working in that type of environment, never seen a
2	that to me.	2	dog so thirty when you arrive, even if they turned over
3	Q. Okay, and the shelter staff, that would	3	their water bowl since you were there the day before, they
4	have been Ms. Chastity Perkins; is that right?	4	would not be attacking the water when you filled it up.
5	A. Yes, and Melvin Dalton.	5	Q. Okay. And did you ever address any of
6	Q. Dalton?	6	those issues that you just described with Ms. Perkins?
7	A. The animal control officer.	7	A. No.
8	Q. Okay, and just before this deposition, Ms.	8	Q. All right.
9	Perkins, although she's been married, her last name is now	9	A. I didn't feel that it was my place.
10	Jones, testified that she was at the shelter every day	10	Q. Okay. What about Mr. Dalton?
11	during the week with the exception of holidays; would you	11	A. No.
12	agree or disagree with that?	12	Q. Okay. But I believe that we're going to
13	MR. GUYNN: I'm going to object to the	13	get into it; you attempted to address some of these issues
14	characterization.	14	with the Sheriff?
15	MR. STRELKA: Do you mind telling me	15	A. Yes.
16	MR. GUYNN: She said that she was there	16	MR. STRELKA: All right. Well, I'd like to
17	holidays, too.	17	enter this as an Exhibit, the letter.
18	MR. STREIKA: Okay.	18	(mlanches and desired desired and an analysis
19	MR. GUYNN: She said the shelter wasn't	19	(The above-mentioned document was marked as
20	open, but she was there.	20	Deposition Exhibit Number 42 and entered into the
21	MR. STRELKA: But she was there, all	21	Deposition.)
22	right.	22	DV ND CHROTIVA
23	BY MR. STRELKA:	23	BY MR. STRELKA:
24	Q. Mr. Guynn may have clarified my point. Ms.	24	Q. I'd like you to take a look at Exhibit
1	Page 15	1	Page 17
1	Jones testified that she was there every day of the week;	1	Number 42, which just has been placed in front of you.
3	would you agree or disagree with that?  A. I find it hard to believe, because when	3	A. Do you want me to hold this one?
		4	Q. Yes, you can pick it up. What is Exhibit Number 42?
5	volunteers would go to the shelter, there would be so much feces in their run; I mean, I have worked in facilities	5	A. This is a letter that the volunteers and
6	for 20 years, and I've cleaned a lot of kennels in my 20	6	
7	years of taking care of pets that are boarded in a kennel	7	myself put together to these are the issues that all of the volunteers, we all sat down together, and as a group,
8		8	
	situation, and I know how much 24 hours worth of food,		when I became president, this is these are issues that
9 10	what it looks like, so when I go there and I see that there is so much feces and urine that the dog is covered	9	they had worked on previous to me even becoming president. I've been a volunteer even prior to becoming
11	from head to toe because the only place to lay down is in	10	president, and they asked me to address these items with
12	the piles and piles and piles of feces, and they have no	12	
13	water, they are so thirsty, that as soon as you turn on	13	the County, and at the time, the County was telling us that the Sheriff is the person that we should relay these
14	the water hose, they attack the hose and are trying to	14	concerns to, so we all sat down as a group and made this
15	drink out of the hose.	15	letter and then I took it to him.
16	You fill their bowl and the whole entire	16	Q. And who at the County informed you that the
17	large bowl disappears because they are so thirsty, this	17	Sheriff was the person to whom you should send the letter?
18	tells me as someone who has worked 20 years in this	18	A. The Board of we were getting that
19	profession, that pet did not have care the day before,	19	information from the Board of Supervisors, but I can't be
20	maybe two days before, and when I worked in the facility	20	exact on those details.
21	where we took care of up to 50 dogs in a very similar	21	Q. Okay. Okay, and was this letter written on
22	situation, very similar size and type of kennels, we would	22	February 6, 2011?
23	pooper scoop every day, make sure the water bowl was	23	A. I'm sorry, so the president prior to me had
	filled every day and I've never, never in all of those	24	had these similar discussions with the Sheriff and Board
24			

1 2			5 UII V4/1V/2V15 1 ages 1021
	Page 18 of Supervisors.	1	Page 20 A. No.
	Q. Okay.	2	Q. Okay. You are not a licensed veterinarian?
3	A. And that prior president gave me that	3	A. No.
4	information.	4	Q. Okay, and you never attended vet school?
5	Q. I understand, okay. But this letter was	5	A. No.
6	written on February 6, 2011; is that right?	6	Q. Okay. And you've never worked at a vet's
7	A. Yes.	7	office?
8	Q. Okay, and did you consult an attorney when	8	A. Yes.
9	you drafted this letter?	9	Q. You have?
10	A. No, I didn't.	10	A. Yes.
11	Q. But apparently, you must have done some	11	Q. At the clinic?
12	research because it looks like you are citing statutes or	12	A. At private practices.
13	Code Sections?	13	Q. Okay.
14	A. Yes; as I said before, I've worked in	14	A. And also at Virginia Tech Veterinary
15	veterinary medicine for 20 years, and I understand the	15	Hospital.
16	protocols and laws that are put forth and governs a	16	Q. Okay.
17	shelter or any facility that shelters animals, that there	17	A. And at the veterinary school which is
18	are those laws and governing bodies.	18	within the veterinary hospital.
19	Q. What is your experience in veterinary	19	Q. Can you describe for me what it is that you
20	medicine?	20	did, what your title was, for instance, when you worked at
21	A. I've done a lot of different things, but I	21	these various places?
22	think that, for a shelter, I volunteered at a lot of	22	A. Over the years, I had different jobs. I
23	shelters. I volunteered at Montgomery County Humane	23	worked in the business office, I've worked in the
24	Society, which is a no kill facility; I've been involved	24	laboratory. My exact one of the jobs, I will call it a
	bootee, which is a no him facility, I we seem involved		induction. In chart on the justification of
1	Page 19 with the Montgomery County pound and a lot of their	1	Page 21 glorified kennel helper, but I was a lab technician was my
2	volunteers, and that is where I learned a lot of	2	title, and that is when I was on the team that we took
3	information, before becoming a volunteer with Giles Animal	3	care of all of the teaching dogs and the research dogs and
4	Rescue.	4	we made sure that their kennels were properly cleaned
5	Q. So your experience is a lot of hands-on	5	every day and that they had proper bedding.
6	A. Hands-on.	6	Q. Okay.
7	Q. Hold on a second.	7	A. And that is where I learned where the
8	A. Sorry.	8	space what the space requirements are for a shelter,
9	Q. A lot of hands-on experience at various	9	for the space that the dog is housed, and all of those
10	shelters; is that what you are saying?	10	types of things.
11	A. Yes, and working at veterinary clinics and	11	Q. Okay. Looking at the issues that you
12	primarily at Virginia Tech, the veterinary teaching	12	highlighted in this 2011 letter
	hospital and school, and at the veterinary school, they	13	A. Yes.
1 1 3	have up to I was on a team where we took care of up to	14	Q do these issues persist into the Year
13		15	2013?
14	5() doog and cate and they were housed in a yeary cimilar		EVIJ.
14 15	50 dogs and cats, and they were housed in a very similar situation like a shelter, and I was involved with writing		A. The situation with the lights being on a
14 15 16	situation like a shelter, and I was involved with writing	16	A. The situation with the lights being on a
14 15 16 17	situation like a shelter, and I was involved with writing process for the protocols, the laws, and any time the laws $% \left( 1\right) =\left( 1\right) \left( 1\right)$	16 17	timer, that was resolved.
14 15 16 17 18	situation like a shelter, and I was involved with writing process for the protocols, the laws, and any time the laws would change, you know, what would have to be updated to	16 17 18	timer, that was resolved. Q. Okay.
14 15 16 17 18	situation like a shelter, and I was involved with writing process for the protocols, the laws, and any time the laws would change, you know, what would have to be updated to the way that we would take care of the animals.	16 17 18 19	timer, that was resolved.  Q. Okay.  A. But other than that, I would say no, they
14 15 16 17 18 19 20	situation like a shelter, and I was involved with writing process for the protocols, the laws, and any time the laws would change, you know, what would have to be updated to the way that we would take care of the animals.  Q. Okay, did you receive any education in this	16 17 18 19 20	timer, that was resolved.  Q. Okay.  A. But other than that, I would say no, they were not resolved.
14 15 16 17 18 19 20 21	situation like a shelter, and I was involved with writing process for the protocols, the laws, and any time the laws would change, you know, what would have to be updated to the way that we would take care of the animals.  Q. Okay, did you receive any education in this area, not work experience, and let me just say the great	16 17 18 19 20 21	timer, that was resolved.  Q. Okay.  A. But other than that, I would say no, they were not resolved.  Q. Okay. And that these issues persisted in
14 15 16 17 18 19 20 21 22	situation like a shelter, and I was involved with writing process for the protocols, the laws, and any time the laws would change, you know, what would have to be updated to the way that we would take care of the animals.  Q. Okay, did you receive any education in this area, not work experience, and let me just say the great caveat here is work experience is an education, but aside	16 17 18 19 20 21 22	timer, that was resolved.  Q. Okay.  A. But other than that, I would say no, they were not resolved.  Q. Okay. And that these issues persisted in 2013, other than the timer?
14 15 16 17 18 19 20 21	situation like a shelter, and I was involved with writing process for the protocols, the laws, and any time the laws would change, you know, what would have to be updated to the way that we would take care of the animals.  Q. Okay, did you receive any education in this area, not work experience, and let me just say the great	16 17 18 19 20 21	timer, that was resolved.  Q. Okay.  A. But other than that, I would say no, they were not resolved.  Q. Okay. And that these issues persisted in

# Pages 22...25

		Christine Link-Ov	wen	s on 04/10/2015 Pages 2225
		Page 22		Page 24
1		3, I think that you said that you were	1	A. This is a photocopy of the form that is
2	_	s to the Sheriff at that time, or letters in	2	given to people when they adopt a pet from the shelter,
3	February?		3	and this bottom portion is what they are supposed to.
4	Α.	Primarily communicating by email at that	4	When they go to have the pet spayed or neutered, they are
5	time.		5	to take this form to the vet's office and ask the vet to
6	Q.	Okay. And did the Sheriff ever respond to	6	complete the bottom portion and to mail it in to the
7	your emails?		7	officer, the animal control officer, who then will
8	Α.	Once that I remember, and that was when I	8	authorize that their \$150 deposit be returned.
9	_	s attention that an adoption had occurred	9	Q. Okay. And now, I will let you know that
10		d not collect a spay/neuter deposit from the	10	Ms. Jones looked at this document earlier and testified
11	person adoptin	ng.	11	that, I believe, that from the information on this form,
12	Q.	Okay.	12	it indicated that the pet that was being adopted was
13	Α.	And he did respond; he responded, but not	13	already neutered?
14	that it was re	esolved in response, but his response was	14	A. It was not, and I have veterinary records
15	that		15	to back that up, so what happened is this Nance family
16	Q.	What was your understanding?	16	came to me the very next day and they said that we've
17	Α.	I knew that he received the email, let's	17	adopted this dog, and we can't afford to neuter it but we
18	say.		18	want to get it neutered, can you help us, and I said yes,
19	Q.	Okay, thank you. What is your	19	ma'am, and I gave them a free spay and neuter certificate,
20	understanding	of the proper policy for the spay/neuter	20	which I have authorization to do with Virginia Tech
21	refund policy	?	21	because I work with the program there at Virginia Tech, so
22	Α.	It is if you look in the Giles County	22	I gave them the certificate, and they did go and have the
23	laws laws :	is not the right word.	23	dog neutered and then brought me the paperwork that it had
24	Q.	Ordinance?	24	been spayed and neutered, and I also spoke with the staff
		Page 23		Page 25
1	Α.	Ordinances, thank you, the Giles County	1	that also verified that it was done.
2	ordinances, th	nat if a pet is not known to be spayed and	2	Q. Okay. And you say that you spoke with
3		n the person adopting must pay the \$150	3	is that a Sammy Nance?
4	deposit.		4	A. Yes, Mr. Nance and his wife, Mrs. Nance.
5	Q.	Okay.	5	Q. Okay. And they indicated to you that the
6	Α.	And then once they have the pet spayed or	6	dog was not neutered when they adopted the animal?
7	neutered and t	they provide proof from a veterinarian that	7	A. Correct, and so Mrs. Nance said to me, I
8	this was done	, then the County will refund the \$150	8	asked her, I said, so they let you adopt the dog, so I
9	deposit.		9	wanted to make sure that I was very clear that I got all
10	Q.	Okay.	10	of the proper details, because I knew that this was very
11	Α.	Plus, plus, the person has to pay a \$20	11	serious, I said to her, so they allowed you to adopt the
12	adoption fee.		12	dog and it was and you, even though you stated that you
13	Q.	All right, and something occurred that made	13	could not afford to spay and neuter, she her response
14	you think that	that wasn't happening; is that right?	14	was, Chastity told us to just promise to make sure that we
15	A.	Yes.	15	did get it done.
16	Q.	Okay.	16	Q. Okay.
17	A.	So as I said before, our group advocates	17	A. That this time, she that Chastity said
18	spaying and ne	eutering, and we do what we can in the	18	to them, she understood that they could not afford it, but
19	community to a	a provide assistance to people who can't	19	she wanted to save the dog. Chastity was so worried about
20	afford spay/ne	euter, so I believe on April 6th	20	saving the dog that she let she allowed it.
21	Q.	Here, let me show you, does this document	21	Q. Okay. All right. And what is on the
22	help you?		22	second page of this document?
23	A.	Yes, it does.	23	A. The second page is the receipt where the
24	0	Tille at the first and a summer of the state	1 24	nearly did now the \$20 adoption for

24 people did pay the \$20 adoption fee.

What is this document?

24

		wen	s on 04/10/2015 Pages 2629
1	Page 2		Page 28
1	Q. Okay. And have you ever seen well, let me ask you this: Did you ever process adoptions at the	1	Q. Do you know an April Lowry?
2		2	A. Yes.
3	shelter?	3	Q. Who is April Lowry?
4	A. Oh, yes.	4	A. She's one of the long-term volunteers of
5	Q. Would you fill out these receipts yourself:		our group. I believe that she was in the original group
6	A. Yes, there was a standard receipt book that		that founded in 1999. She's been a volunteer since then.
7	we were required to fill out and we did so.	7	She's been I think that she served as the president at
8	Q. And the amount indicated on this receipt so		one point in time, and she's been a rescue coordinator for
9	how much?	9	the group for a long time.
10	A. \$20 cash.	10	Q. Okay. Did you ever have any discussion
11	Q. Okay.	11	with Ms. Lowry or any other members of GCAR about what
12	A. A spay/neuter deposit is taken in, and if	12	could be done at the shelter to remedy some of these
13	it's taken in, it is on a separate receipt. Would you	13	issues?
14	like to see an example?	14	A. Our primary focus was to try to replace the
15	Q. I would.	15	employee that we felt was not doing their job.
16	A. And they purposely I'm not sure why, but		Q. And who was that?
17	they actually had separate receipt books for that	17	A. Chastity.
18	situation. I guess because they wanted to make sure that	18	Q. Okay, and was there ever any discussion
19	they were tracking it and they gave the person their	19	about putting in new devices at the shelter, such as a
20	deposit back, perhaps.	20	time clock or cameras?
21	Q. Okay.	21	A. Yes, we strongly encouraged the County to
22	A. So yes, so this is a situation where this	22	do that and offered to pay for that, because we felt so
23	person adopted a dog and they actually wrote the two	23	passionate about having that documentation and
24	separate receipts, the \$20 for the adoption and the \$150	24	accountability for the staff.
_			
	Page 2	7	Page 29
1	Page 2 for the spay and neuter deposit.	1	Page 29 Q. Okay, and to whom did you actually
1 2			
	for the spay and neuter deposit.	1	Q. Okay, and to whom did you actually physically offer, make this offer to?  A. It was in a meeting with the Sheriff, and I
2	for the spay and neuter deposit.  MR. STRELKA: Okay, I'm not going to make	1 2	Q. Okay, and to whom did you actually physically offer, make this offer to?
2 3	for the spay and neuter deposit.  MR. STRELKA: Okay, I'm not going to make this a separate Exhibit; I will just go by her	1 2 3	Q. Okay, and to whom did you actually physically offer, make this offer to?  A. It was in a meeting with the Sheriff, and I
2 3 4	for the spay and neuter deposit.  MR. STRELKA: Okay, I'm not going to make this a separate Exhibit; I will just go by her testimony that two receipts were made, unless you	1 2 3 4	Q. Okay, and to whom did you actually physically offer, make this offer to?  A. It was in a meeting with the Sheriff, and I believe that it was Chris McKlarney that was there, yes.
2 3 4 5	for the spay and neuter deposit.  MR. STRELKA: Okay, I'm not going to make this a separate Exhibit; I will just go by her testimony that two receipts were made, unless you have an objection that you want it included.	1 2 3 4 5	Q. Okay, and to whom did you actually physically offer, make this offer to?  A. It was in a meeting with the Sheriff, and I believe that it was Chris McKlarney that was there, yes.  Q. And did you speak and make this offer or
2 3 4 5 6	for the spay and neuter deposit.  MR. STRELKA: Okay, I'm not going to make this a separate Exhibit; I will just go by her testimony that two receipts were made, unless you have an objection that you want it included.  MR. GUYNN: No, that is okay.  BY MR. STRELKA:  Q. So you can take this back, so this is your	1 2 3 4 5 6	Q. Okay, and to whom did you actually physically offer, make this offer to?  A. It was in a meeting with the Sheriff, and I believe that it was Chris McKlarney that was there, yes.  Q. And did you speak and make this offer or did someone else from GCAR?  A. I was there offering that the vice president, Mr. Herbert, was also at the same meeting.
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Page 32  arrive at the deliber until around 2:00, and so it was beginning that Ms. Perkins would come just prior to us to clean, water, feed, so that the shelter would be ready for the public and the volunteers to arrive, but on that particular day. I had to go early to get a lot of things dome, and I will appray out the deatils, but I had to return a lot of crates and wash then out, and so Chastity return a lot of crates and wash then out, and so Chastity return a lot of crates and wash then out, and so Chastity return a lot of crates and wash then out, and so Chastity time, because whe dig just done a large transport. We had received and publied a lot of dogs and taken then to a no kill encountry, so she was there to feed and water and clean the kennels, make 20 minutes tops, and then she clean the kennels, make 20 minutes tops, and then she clean the kennels, make 20 minutes tops, and then she clean the kennels, make 20 minutes tops, and then she clean the kennels, make 20 minutes tops, and then she clean the kennels, make 20 minutes tops, and then she clean the kennels, make 30 minutes tops, and then she clean the kennels, make 30 minutes tops, and then she clean the spain, 1'm worked 30 years and 1've cleaned a lot of danging out dirty water books, it was obvious to me, because again, 1'm worked 30 years and 1've cleaned a lot of backers books, and if you are cleaning then properly be they ges a uniting from the anima of the dog, there is a lot of building around the edge of the water book.  Q. likes a think film, and once it dries, 1 a sees, you now hardly distalt that suff our of these for a nonking for a long time and properly brush cleaning it,  2 hunders, for dound, were all — all had thin residue be because they were not being properly brush cleaning the proper local day, which was to being properly ash, and like you would your glasse before you drink out of it, if you just washed it a severy day, you would not get that hilling, and at that time, it was ny cheervaction that all of the water houls, th		Christine Link-Owens on 04/10/2015 Pages 3033				
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second and public and the volunteers to arrive, but on that the public and the volunteers to arrive, but on that the public and the volunteers to arrive, but on that the public and the volunteers to arrive, but on that the public and the volunteers to arrive, but on that the public and the volunteers to arrive, but on that the public and the volunteers to arrive, but on that the particular day, I had to go arely to get a lot of things dome, and I will spare you the details, but I had to return a lot of crates and wesh then out, and so Chastity arrived there were only three dogs in the shelter at that a this principle, because we had just done a large transport. We had rescued and public done a large transport. We had rescued and public done a large transport. We had rescued and public done a large transport. We had rescued and public done a large transport. We had rescued and public done a large transport. We had rescued and public done a large transport. We had rescued and public done a large transport. We had rescued and public done a large transport. We had rescued and public done a large transport. We had rescued and public done and there to feed and water and look at Emplis, we saw that I was soping to be because the first water books.  13 Q. Goay. Mast this in 2013?  2 Q. May.  3 A. May.  4 A. May.  5 A. Guy.  15 A. Wes.  16 A. And the water books of the water books.  18 Q. Goay. Mast this in 2013?  2 Q. May.  4 A. May.  5 A. Guy.  19 A. Guy.  10 A. I will represent on you that this is a 10 close at Echibit, Ranber 43.  2 A. May.  2 A. Livil represent to you that this is a 11 clock at Echibit Ranber 43.  2 A. May.  2 A. May.  2 A. Livil represent to you that this is a 12 clock at Echibit Ranber 43.  3 A. Yes.  4 Cay.  4 A. Wes.  3 A. Ves.  4 Cay.  4 A. Wes.  5 A. Guy.  5 A. Guy.  5 A. Guy.  6 A. West or the Exertify to the book with this is a contraction than the was not because the water books.  5 A. Guy.  6 A. West or the book of the books which is also a disease 10 color, it was quite christions why al				A. This is my handwriting.		
the public and the volunteers to arrive, but on that by a particular day, I had to go early to get a lot of thirds of done, and i will agraw you the details, but I had to go return a lot of crates and wash them out, and so Chestity time, because we had just the details, but I had to go return a lot of crates and wash them out, and so Chestity time, because we had just the headals, but I had to go restricted there were only three dogs in the shelter at that it is time, because we had just them as large transport. We had rescued and pulled a lot of dogs and taken them to a no likili sectorary, so also was there to feed and water and licean the kemple, maybe 20 introduct toge, and then she left, and that is when I observed that she was not learning the details when I observed that she was not learning the details of water books, and if you are cleaning then properly.  The because again, I'm worked 20 years and I've cleaned a lot of water books, and if you are cleaning then properly.  The because again, I'm worked 20 years and I've cleaned a lot of water books, and if you are cleaning then properly.  The because again, I'm worked 20 years and I've cleaned a lot of water books, and if you are cleaning then properly.  The because again, I'm worked 20 years and I've cleaned a lot of water books, and if you are cleaning then properly as a lot of buildup around the edge of the water book.  The second and pulled a lot of dogs and taken then to a no like a lot of buildup around the edge of the water book.  Department of the books which is also a disease to clean, it was going to the book which is also a disease control issue.  Me. STELEA: Okey, I'd like to mark this as the none being properly leaned, and then cone being the properly belanced in the properly and the second heating?  The because they were not being properly cleaned, and then from that particular day, when I was never cleaning, proper cleaning of the books which is also a disease control issue.  Me. STELEA: Okey, I'd like to mark this as the none being of th	2	typical that Ms. Perkins would come just prior to us to	2	Q. You wrote this?		
5 particular day, I had to go early to get a lot of things 6 down, and I will spure you the details, but I had to 7 return a lot of cractes and wash them out, and so Chastily 8 arrived: there were only three does in the shelter at that 9 time, because we had just dome a large transport. We had 10 rescoed and pulled a lot of dogs and taken them to a no 11 kill sanctuary, so she was there to feed and water and 12 clean the kemmels, maybe 20 sinutes tops, and then she 13 left, and that is when I cheerved that she was not 14 charging out dirty water books. 15 Q. Okay. 16 A. And the water books. 16 Q. Okay. 17 because again, I'm worked 20 years and I've cleaned a lot 18 of water books, and if you are cleaning the properly, 19 they get a buildup from the saliva of the dog. There is a 20 lot of buildup around the edge of the water book. 21 Q. Like a filing 22 anal. You can hardly chized that stuff out of there for 23 asking for a long time and properly brush cleaning it, 24 asking for a long time and properly brush cleaning it, 25 every day, you would not get that buildup, and at that 26 time, it was my cheevartien that all of the water books, 27 blockes, food books, were all — all bat this residue 28 because they were not being properly cleaned, and then 29 out the book and refilling it. It was never cleaning, 30 out the book and refilling it. It was never cleaning, 40 proper cleaning of the books which is also a disease 41 control insue. 42 (Charle, I believe. 43 charles the proper was an interest of the proper cleaning of the books which is also a disease 44 A. And Welvin Dalton and Chris McKlarmey and 45 charles, I believe. 46 Charles, I believe. 47 Charles, I believe. 48 Charles, I believe. 49 Q. Okay. And who was at this meeting? 40 Q. Okay. And who was at this meeting? 41 A. And Welvin Dalton and Chris McKlarmey and 42 Charles, I believe. 49 Q. Okay. And who was at this meeting? 40 Q. Okay. And who was at this meeting? 41 A. And Welvin Dalton and Chris McKlarmey and 42 A. And Welvin Dalton and Chris McKlarmey a	3	clean, water, feed, so that the shelter would be ready for	3			
6 done, and I will spare you the details, but I had to 7 return a lot of crates and such then out, and so Chastity 8 arrived there were only three dogs in the shelter at that 9 time, because we had just done a large transport. We had 10 rescued and pulled a lot of dogs and taken then to a no 11 kill searctuary, so she was three to feed and water and 12 clean the kammula, maybe 20 minutes tops, and then she 13 lett, and the is when I observed that she was not 14 changing out dirty water bowls. 15 Q. Gksy. 16 A. And the water bowls, it was obvious to me, 16 A. And the water bowls, it was obvious to me, 17 because again, I'm surked 20 years and I'we cleared a lot. 18 of water bowls, and if you are cleaning them properly, 19 they gue a buildup from the saliva of the dog. There is a 10 to thildup around the edge of the water bowl. 20 Q. Like a film? 21 A. Like a film? 22 A. Like a film? 23 mean, you an hardly chiesh that stuff out of there for 24 souking for a long time and properly hrush cleaning it, 25 buckets, food bowls, were all — all had this residue 26 because they were not being properly cleaned, and then 27 from that particular day, when I was there, when she came 28 to clean, it was quite obvious why: she was just hosing 29 out the bowl and refilling it. It was never cleaning, 29 proper cleaning of the bowls which is also a disease 20 control issue. 21 M. STREIKE Okay. I'd like to mark this 22 proper cleaning of the bowls which is also a disease 23 Christine. 24 Christine. 25 Deposition. 26 Peposition. 27 Like a film? 28 Peposition. 29 Defore we get to biblibt Number 43, I want 21 to take a look at the book of Edhibt Number 41, Decause 21 there is some hunder'than notes there. 22 Like a look at the book of Edhibt Number 41, I because 23 there is some hunder'than notes there. 29 Charles, I believe. 20 Deposition. 20 Defore we get to biblibt Number 41, I because 21 there is some hunder'than notes there. 21 Look at the distinguing and were 22 there is not hunder than out, and then 23 the strength of the books	4	the public and the volunteers to arrive, but on that	4	Q. And when did you write this?		
7 return a lot of crates and wash them out, and so Chastity 8 arrived; there were only three days in the shalter at that 10 time, because we had just done a large transport. We had 10 rescued and pulled a lot of days and taken them to a no 11 kill sanctuary, so she was there to feed and water and 12 cleam the kernels, maybe 20 minutes tops, and then she 13 left, and that is when I observed that she was not 14 champing out ditry water bowls. 15 Q. Oksy. 16 A. And the water bowls, it was obvious to me, 17 because again, I'm wacked 20 years and I'we cleamed a lot 18 of water bowls, and if you are cleaning them properly, 19 they get a buildap from the saliva of the day. 19 Q. Like a film? 20 Q. Like a film? 21 a like a like it like third third the day. 22 A. Like a film? 23 mean, you can hardly chiesh that stuff out of there for 24 sooking for a long time and properly brush cleaning it, 25 bockets, food bowls, were all — all had this residue 26 because they were not being properly cleaned, and then 27 from that particular day, when I was there, when she came 28 to cleam, it was quite obvious why; abe was just hosing 29 out the bowl and refilling it. It was never cleaning, 20 proper cleaning of the bowls which is also a disease 21 control issue. 22 M. STRELEA: 33 Q. Oksy. And the second line of your email, 34 free, it was my observation that all of the water bowls, 35 bockets, food bowls, were all — all had this residue 36 because they were not being properly cleaned, and then 37 from that particular day, when I was there, when she came 38 to cleam, it was quite obvious why; abe was just hosing 39 out the bowl and refilling it. It was never cleaning, 30 proper cleaning of the bowls which is also a disease 30 control issue. 31 Q. Segree we get to Edhibit Number 43, I want 32 Deposition Edhibit, please. 33 Q. Oksy. And who was at this meeting? 34 A. Wes. 35 Q. Oksy. Rad who was at this meeting? 35 Q. Sefore we get to Edhibit Number 43, I want 36 Deposition Edhibit Number 43 and entered into the 37 Deposition Edhibit N	5	particular day, I had to go early to get a lot of things	5	A. When did I write this?		
8 strived; there were only three dogs in the shelter at that 9 time, because we had just dame a large transport. We had 10 rescued and pulled a lot of dogs and taken then to a no 11 kill sanctuary, so she was there to feed and water and 12 clean the kernels, supte 20 minutes tape, and then she 13 left, and that is when I chewred that she was not 14 changing our dirty water bowls. 15 Q. Gday. 16 A. And the water bowls. 16 A. And the water bowls, it was obvious to me, 17 because again, I'm worked 20 years and I've cleaned a lot 18 of water bowls, and if you are cleaning them properly, 19 they get a buildup from the saliva of the dog. There is a 10 lot of huildup around the edge of the water bowl. 21 Q. Like a film? 22 A. Like a film? 23 mean, you can hardly chisel that stuff out of there for 24 soaking for a long time and properly brush cleaning it, 25 time, you would not get that huildup, and at that 26 time, it was not observation that all of the water bowls, 27 but if you just properly wash, and like you would your 29 glass before you drink out of it, if you just washed it 20 time, if you just properly wash, and like you would your 21 glass before you drink out of it, if you just washed it 22 every day, you would not get that huildup, and at that 23 every day, you would not get that huildup, and at that 24 time, it was not observation that all of the water bowls, 25 buckets, food bowls, were all — all had this residue 26 because they were not being properly cleaned, and then 27 from that particular day, when I was there, when she came 28 to clean, it was quite obvious why: she was just hosing 30 out the bool and refilling it. It was never cleaning, 31 proper cleaning of the bowls which is also a disease 4 colean, it was quite obvious why: she was just hosing 5 proper cleaning of the bowls which is also a disease 6 colean, it was quite obvious why: she was just hosing 7 proper cleaning of the bowls which is also a disease 8 peposition Exhibit, please. 9 Q. Before we get to Exhibit Rumber 43, I want 17 Lot day a	6	done, and I will spare you the details, but I had to	6	Q. Yes, ma'am.		
time, because we had just dome a large transport. We had 10 rescued and polled a lot of dogs and taken them to a no kill sanctuary, so she was there to feed and waster and 11 clean the kennels, maybe 20 minutes tops, and them she clean did the changing out dirty water bowls.  13 left, and that is when I observed that she was not to waster down dirty water bowls, it was obvious to me, 16 of waster bowls, and if you are cleaning them properly, 19 they get a buildup from the saliva of the dog. There is a 20 lot of buildup around the edge of the water bowl.  14 cy Like a film?  25 man, you can hardly chisel that stuff out of thems for soaking for a long time and properly brush cleaning it, 21 severy day, you sould not get that buildup, and at that time, it was my observation that all of the water bowls, 5 bockets, food bowls, were all — all had this residue because they were not being properly cleaning of the bowls which is also a disease to clean, it was guite obvious why; she was just browing out the bowl and refilling it. It was never cleaning, 10 proper cleaning of the bowls which is also a disease 11 control issue.  10 MR. STREIKA: (Kay. I'd like to mark this a 20 possition.)  11 Decause again.)  12 The show-mentioned document was marked as 12 to that had both the water bowls, 12 to take a look at the bowls which is also a disease 12 control issue.  13 Proper cleaning of the bowls which is also a disease 12 control issue.  14 (The above-mentioned document was marked as 15 to take a look at the back of Schibit Number 43, I want to take a look at the back of Schibit Number 43, I want to take a look at the back of Schibit Number 43, I want to take a look at the back of Schibit Number 43, I want to that a waste of the water dowls, 15 to take a look at the back of Schibit Number 43, I want to take a look at the back of Schibit Number 43, I want to take a look at the back of Schibit Number 43, I want to take a look at the back of Schibit Number 43, I want to take a look at the back of Schibit Number 43, I want to ta	7	return a lot of crates and wash them out, and so Chastity	7	A. I don't remember. It's whenever I made		
10 rescued and pulled a lot of dogs and taken them to a no 11 kill sanctuary, so she was there to feed and water and 12 clean the kennels, maybe 20 minutes tops, and then she 13 left, and that is when I observed that she was not 14 charging out dirty water bowls. 15 Q. Gday. 16 A. Pard the water bowls, it was obvious to me, 17 because again, I'm worked 20 years and I've cleamed a lot 18 of water bowls, and if you are cleaming them properly, 19 they get a buildup from the saliva of the dog. There is a 20 lot of buildup around the edge of the water bowl. 21 Q. Like a thick film, and once it dries, I 22 mean, you can hardly chisel that stuff out of there for 23 soaking for a long time and properly brush cleaning it, 24 wery day, you would not get that buildup, and at that 25 buckets, food bowls, were all — all had this residue 26 because they were not being properly cleaned, and then 27 from that particular day, when I was there, when she came 28 to clean, it was quite obvious why; she was just hosing 29 out the bowl and refilling it. It was never cleaming, 30 out the bowl and refilling it. It was never cleaming, 31 out repore cleaning of the bowls which is also a disease 32 to clean, it was quite obvious why; she was just hosing 33 as the next Exhibit, please. 34 PR. SIREIKA: Okay. I'd like to mark this 35 as the next Exhibit, please. 45 (The above-mentioned document was marked as 46 (The above-mentioned document was marked as 47 look at Exhibit. Number 43 and entered into the 48 sure that I could identify who wrote that. 49 (A. Okay. 40 (All right. Now, I would like you to take a 40 look at Exhibit Number 43. 40 (All right. Now, I would like you to take a 41 look at Exhibit Number 43. 41 was that I while I was returned a look at the back of Exhibit Number 43. 42 (All right. Now, I would like you to take a 41 look at Exhibit Number 43. 42 (All right. Now, I would like you to take a 42 look at Exhibit Number 43. 43 (All right. Now, I would like you to take a 44 (All right. Now, I would like you to take a 45 (All r	8	arrived; there were only three dogs in the shelter at that	8	this photocopy, because I knew that I was going to be		
11   Santtary, so she was there to feed and water and   12   2	9	time, because we had just done a large transport. We had	9	having a meeting with the Sheriff, but then he didn't want		
12   clean the kennels, maybe 20 minutes tops, and then she   13   left, and that is when I observed that she was not   13   0. Okay. Thank you. I just wanted to make	10	rescued and pulled a lot of dogs and taken them to a no	10	to see documentation.		
13   left, and that is when I observed that she was not   14 changing out dirty water bowls.   15   20. Okay.   16   20. All right. Now, I would like you to take a   16   20. All right. Now, I would like you to take a   17   lock at Exhibit Number 43.   18   20. Okay.   19   20. I will represent to you that this is a   20   lot of buildup around the edge of the water bowl.   20   Like a film?   20. Like a film?   21   22   A. Like a thick film, and once it dries, I   22   3013.   3   3   3   3   3   3   3   3   3	11	kill sanctuary, so she was there to feed and water and	11	Q. Okay. Was this in 2013?		
the changing out dirty water bowls.    16	12	clean the kennels, maybe 20 minutes tops, and then she	12	A. Yes.		
15 Q. Okay.  A. And the water bowls, it was obvious to me, to because again, I'm worked 20 years and I've cleaned a lot of water bowls, and if you are cleaning them properly. 19 they get a buildup from the saliva of the dog. There is a control issue.  10 Like a film? 20 Like a film? 21 Q. Like a film? 22 A. Like a thick film, and once it dries, I control issue.  10 Saliking for a long time and properly brush cleaning it, control issue.  10 Like a film? 21 But if you just properly wash, and like you would your control issue.  11 Control issue.  12 MR. STREIKA: 13 Chest. 14 Like a thick is also a disease 15 Christine. 16 Q. Mand the water bowls, before you drink out of it, if you just weaked it control issue. 16 Deposition.)  17 Lok at Exhibit Number 43.  18 A. Okay.  19 Q. I will represent to you that this is a control issue. 20 United and not filling it. I was my observation that all of the water bowls, because they were not being properly cleaned, and then from that particular day, when I was there, when she came to clean, it was quite obvious why: she was just hosing out the bowl and refilling it. I was never cleaning, proper cleaning of the bowls which is also a disease 10 Control issue. 11 Control issue. 12 MR. STREIKA: Ckay. I'd like to mark this a beposition.) 13 PROSITEIXA: Ckay. I'd like to mark this control issue. 14 A. And Melvin Dalton and Chris McKlarney and Charlie, I believe. 15 A. Okay. 16 Charlie, I believe. 17 A. I think that that is when we we really didn't have a chance to speak much. We were just kind of being told at that meeting that we were probably not going the soon and they are there, that we were not going the soon and there is some handritten notes there. 28 Christine. 29 Charlier, I was my observation that all of the water bowls, because they were not being properly cleaned, and then from that particular day, when I was there, when she came to clean it was marked as the properly was a proper cleaning of the bowls which is also a disease 19 Charlier, I was my observation that all	13	left, and that is when I observed that she was not	13	Q. Okay. Thank you. I just wanted to make		
16 A. And the water bowls, it was obvious to me, because again, I'm worked 20 years and I've cleaned a lot is because again, I'm worked 20 years and I've cleaned a lot is of water bowls, and if you are cleaning them properly, they get a buildup from the saliva of the dog. There is a lot of buildup around the edge of the water bowl.  Q. Like a film?  Q. Like a film, and once it dries, I can be solved by a soaking for a long time and properly brush cleaning it.  They are a long time and properly brush cleaned it.  They are a long time and properly brush cleaned it.  They are a long time and properly brush cleaned it.  They are a long time and properly brush cleaned it.  They are a long time and properly brush cleaning it.  They are a long time and properly brush cleaning it.  They are a long time and properly brush cleaning it.  They are a long time and properly brush cleaning it.  They are a long time and properly brush cleaning it.  They are a long tim	14	changing out dirty water bowls.	14	sure that I could identify who wrote that.		
17 because again, I'm worked 20 years and I've cleaned a lot 18 of water bowls, and if you are cleaning them properly, 19 they get a buildup from the saliva of the dog. There is a 2 lot of buildup around the edge of the water bowl. 2	15	Q. Okay.	15	A. Okay.		
they get a buildup from the saliva of the dog. There is a 20 lot of buildup around the edge of the water bowl.  10 to for buildup around the edge of the water bowl.  21 Q. Like a film?  22 A. Like a thick film, and once it dries, I 22 Animal Rescue to Chris McKlarney on Sunday, January 27, 23 mean, you can hardly chisel that stuff out of there for 30 soaking for a long time and properly brush cleaning it, 30 day.  10 but if you just properly wash, and like you would your 31 glass before you drink out of it, if you just washed it 32 every day, you would not get that buildup, and at that 44 time, it was my observation that all of the water bowls, 54 because they were not being properly cleaned, and then 57 from that particular day, when I was there, when she came 58 to clean, it was quite obvious why; she was just hosing 59 out the bowl and refilling it. It was never cleaning, 50 croper cleaning of the bowls which is also a disease 51 control issue.  10 Popper cleaning of the bowls which is also a disease 51 control issue.  11 Control issue.  12 NR. STREIKA: (Kay, I'd like to mark this 58 pepsition.)  13 A. Ithink that that is when we we really 50 leaned, and entered into the 50 pepsition.)  14 A. Okay.  15 Page 31 A. Okay.  16 Page 32 Christine: So may I assume that you wrote this email? Christine: So may I assume that you wrote this email? Christine: So may I assume that you wrote this email? Christine: So may I assume that you wrote this email? Christine: So may I assume that you wrote this email? Christine: So may I assume that you wrote this email? Christine. So may I assume that you wrote this email? Christine: So may I assume that you wrote this email? Christine email? Christine email? Christine: So may I assume that you wrote this email? Christine email? Christine. So may I assume that you wrote this email? Christine e	16	A. And the water bowls, it was obvious to me,	16	Q. All right. Now, I would like you to take a		
19 they get a buildup from the saliva of the dag. There is a 20 lot of buildup around the edge of the water bowl. 21 Q. Like a film? 22 A. Like a think film, and once it dries, I 23 mean, you can hardly chisel that stuff out of there for 24 soaking for a long time and properly brush cleaning it, 25 soaking for a long time and properly brush cleaning it, 26 soaking for a long time and properly brush cleaning it, 27 soaking for a long time and properly brush cleaning it, 28 soaking for a long time and properly brush cleaning it, 29 glass before you drink out of it, if you just washed it 20 every day, you would not get that buildup, and at that 30 time, it was my observation that all of the water bowls, 41 buckets, food bowls, were all all had this residue 42 because they were not being properly cleaned, and then 43 from that particular day, when I was there, when she came 45 to clean, it was quite obvious why; she was just hosing 46 out the bowl and refilling it. It was never cleaning, 47 proper cleaning of the bowls which is also a disease 48 control issue. 49 Q. And when was the first meeting? 40 proper cleaning of the bowls which is also a disease 40 long out the bowl and refilling it. It was never cleaning, 41 propers document with emails on it. Let's look at the 42 bottom email, on the first page, it says From Giles County 42 A. Okay.  40 Page 33  41 but if you just properly brush cleaning it. 42 Q. And the third page says, "Thank you, 43 A. Yes. 44 Q. Okay. Ard the second line of your email? 45 it says, "I am pleading today to engage your help in 46 secting up a second meeting." Do you recall the first 47 meeting? 48 A. Yes. 49 Q. And when was the first meeting? 40 A. A week or two before this. 40 Q. Okay. And who was at this meeting? 41 A. Okay.  42 Christine." So may I assume that you wrote this email? 43 A. Yes. 40 Q. Okay. And who was the first meeting? 41 A. Okay.  51 Gristine." So may I assume that you wrote this email? 52 A. Yes. 63 A. Yes. 64 Q. Okay. And who was the first meeting? 65 Long And wh	17	because again, I'm worked 20 years and I've cleaned a lot	17	look at Exhibit Number 43.		
10 lot of buildup around the edge of the water bowl. 11 Q. Like a film? 12 Q. Like a film? 13 mean, you can hardly chisel that stuff out of there for soaking for a long time and properly brush cleaning it, so water y day, you would not get that buildup, and at that sue you would not get that buildup, and at that she because they were not being properly cleaned, and then from that particular day, when I was there, when she came to clean, it was quite obvious why; she was just hosing out the bowl and refilling it. It was never cleaning, proper cleaning of the bowls which is also a disease control issue. 10 MR. STREIKA: Okay. I'd like to mark this as the next Exhibit, please. 11 Cy. Band the third page says, 'Thank you, 'Christine.' So may I assume that you wrote this email? 12 A. Yes. 13 A. Yes. 14 Q. Okay. And the second line of your email, it says, 'I am pleading today to engage your help in setting up a second meeting.' Do you recall the first meeting? 15 A. A week or two before this. 16 Charlie I believe. 17 A. A had when was the first meeting? 18 A. Yes. 19 Q. And when was the first meeting? 10 A. A week or two before this. 11 Q. Okay. And who was at this meeting? 12 A. The Sheriff. 13 as the next Exhibit, please. 14 A. A had who was at this meeting? 15 (The above-mentioned document was marked as 16 Deposition.) 16 Deposition.) 17 A. I think that that is when we we really didn't have a chance to speak much. We were just kind of being told at that meeting that we were probably not going to have access to the key and not have a key hanging on the gate anymore, and they wanted volunteers to come and check out a key at the dispatch office, and we were	18	of water bowls, and if you are cleaning them properly,	18	A. Okay.		
Q. Like a film? A. Like a thick film, and once it dries, I aman, you can hardly chisel that stuff out of there for soaking for a long time and properly brush cleaning it,  Page 31 but if you just properly wash, and like you would your glass before you drink out of it, if you just washed it every day, you would not get that buildup, and at that time, it was my observation that all of the water bowls, buckets, food bowls, were all all had this residue because they were not being properly cleaned, and then from that particular day, when I was there, when she came to clean, it was quite obvious whith is also a disease to clean, it was quite obvious whith is also a disease to control issue.  MR. STREIKA: Okay. I'd like to mark this control issue.  MR. STREIKA: Okay. I'd like to mark this Deposition.)  MR. STREIKA: Okay. I'd like to mark this Cife above-mentioned document was marked as Deposition.)  MR. STREIKA: Okay. Before we get to Exhibit Number 43, I want Cife alook a look at the back of Exhibit Number 441, because there is some handwritten notes there.  A. Ham-hmm.  botton email, on the first page, it says Prom Giles County Animal Rescue to Chris McKlarney on Sunday, January 27,  Animal Rescue to Chris McKlarney on Sunday, January 27,  Animal Rescue to Chris McKlarney on Sunday, January 27,  Animal Rescue to Chris McKlarney on Sunday, January 27,  Animal Rescue to Chris McKlarney on Sunday, January 27,  Animal Rescue to Chris McKlarney on Sunday, January 27,  Animal Rescue to Chris McKlarney on Sunday, January 27,  Animal Rescue to Chris McKlarney on Sunday, January 27,  Animal Rescue to Chris McKlarney on Sunday, January 27,  Animal Rescue to Chris McKlarney on Sunday, January 27,  Animal Rescue to Chris McKlarney on Sunday, January 27,  Animal Rescue to Chris McKlarney on Sunday, January 27,  Animal Rescue to Chris McKlarney on Sunday, January 27,  Animal Rescue to Chris McKlarney on Sunday, January 27,  Animal Rescue to Chris McKlarney on Sunday.  Christine.' So may I assume that you wrote this enail?  A.	19	they get a buildup from the saliva of the dog. There is a	19	Q. I will represent to you that this is a		
A. Like a thick film, and once it dries, I mean, you can hardly chisel that stuff out of there for soaking for a long time and properly brush cleaning it,  Page 31 but if you just properly wash, and like you would your glass before you drink out of it, if you just washed it time, it was my observation that all of the water bowls, buckets, food bowls, were all all had this residue because they were not being properly cleaned, and then from that particular day, when I was there, when she came to clean, it was quite obvious why: she was just hosing out the bowl and refilling it. It was never cleaning, proper cleaning of the bowls which is also a disease control issue.  MR. STREIKA: Okay. I'd like to mark this as the next Exhibit, please.  MR. STREIKA: Okay. I'd like to mark this Deposition.  MR. STREIKA: Okay. Think that that is when we we rea	20	lot of buildup around the edge of the water bowl.	20	three-page document with emails on it. Let's look at the		
mean, you can hardly chisel that stuff out of there for soaking for a long time and properly brush cleaning it,  Page 31  but if you just properly wash, and like you would your glass before you drink out of it, if you just washed it time, it was my observation that all of the water bowls, buckets, food bowls, were all all had this residue because they were not being properly cleaned, and then from that particular day, when I was there, when she came to clean, it was quite obvious why; she was just hosing out the bowl and refilling it. It was never cleaning, proper cleaning of the bowls which is also a disease control issue.  MR. STREIKA: Okay. I'd like to mark this as the next Exhibit, please.  MR. STREIKA: Okay. I'd like to mark this peposition. Schibit Number 43 and entered into the Deposition.)  MR. STREIKA:  Q. And the third page says, "Thank you, Christine." So may I assume that you wrote this email?  A. Yes.  Q. Okay. And the second line of your email, setting up a second meeting." Do you recall the first meeting?  The setting up a second meeting. To by ou recall the first meeting?  A. A week or two before this.  Q. Okay. And when was the first meeting?  A. A week or two before this.  Q. Okay. And who was at this meeting?  A. The Sherriff.  A. And Melvin Dalton and Chris McKlarney and Chris McKla	21	Q. Like a film?	21	bottom email, on the first page, it says From Giles County		
Page 31  1 but if you just properly wash, and like you would your 2 glass before you drink out of it, if you just washed it 3 every day, you would not get that buildup, and at that 4 time, it was my observation that all of the water bowls, 5 buckets, food bowls, were all all had this residue 6 because they were not being properly cleaned, and then 7 from that particular day, when I was there, when she came 8 to clean, it was quite obvious why; she was just hosing 9 out the bowl and refilling it. It was never cleaning, 10 proper cleaning of the bowls which is also a disease 11 control issue. 12 MR. SIREIKA: Okay. I'd like to mark this 13 as the next Exhibit, please. 14 Deposition Exhibit Number 43 and entered into the 15 (The above-mentioned document was marked as 16 Deposition.) 17 A. I think that that is when we we really 18 didn't have a chance to speak much. We were just kind of 19 EY MR. SIREIKA: 20 Q. Before we get to Exhibit Number 43, I want 21 to take a look at the back of Exhibit Number 41, because 22 A. Hmm-hmm. 23 A. Okay. 24 A. Okay. 25 And the third page says, "Thank you, 26 Christine." So may I assume that you wrote this email? 26 A. Yes. 27 Okay. And the second line of your email, 28 it says, "I am pleading today to engage your help in 29 esetting up a second meeting." Do you recall the first 29 meeting? 20 And when was the first meeting? 20 And when was the first meeting? 21 A. The Sheriff. 22 A. The Sheriff. 23 A. The Sheriff. 24 A. And Melvin Dalton and Chris McKlarney and 25 Charlie, I believe. 26 Charlie, I believe. 27 And what was discussed at the meeting? 28 didn't have a chance to speak much. We were just kind of 29 being told at that meeting that we were probably not going 20 to take a look at the back of Exhibit Number 43, I want 21 to have access to the key and not have a key hanging on 28 the gate anymore, and they wanted volunteers to come and 29 the gate anymore, and they wanted volunteers to come and	22	A. Like a thick film, and once it dries, I	22	Animal Rescue to Chris McKlarney on Sunday, January 27,		
Page 31  1 but if you just properly wash, and like you would your 2 glass before you drink out of it, if you just washed it 3 every day, you would not get that buildup, and at that 4 time, it was my observation that all of the water bowls, 5 buckets, food bowls, were all all had this residue 6 because they were not being properly cleaned, and then 7 from that particular day, when I was there, when she came 8 to clean, it was quite obvious why; she was just hosing 9 out the bowl and refilling it. It was never cleaning, 10 proper cleaning of the bowls which is also a disease 11 control issue. 12 MR. STREIKA: Okay. I'd like to mark this 13 as the next Exhibit, please. 14 A. And Melvin Dalton and Chris McKlarney and 15 (The above-mentioned document was marked as 16 Deposition.) 17 A. I think that that is when we we really 18 Deposition. 19 BY MR. STREIKA: 10 Q. Before we get to Exhibit Number 43, I want 21 to take a look at the back of Exhibit Number 41, because 22 the re is some handwritten notes there. 23 A. Hmm-hmm. 24 Hm-hmm. 25 Page 33  10 Q. And the third page says, "Thank you, 2 Christine." So may I assume that you wrote this email? 26 Christine." So may I assume that you wrote this email? 28 A. Yes.  Q. Okay. And the second line of your email, it says, "I am pleading today to engage your help in 5 setting up a second meeting." Do you recall the first 6 setting up a second meeting." Do you recall the first 6 meeting?  7 meeting?  8 A. Yes.  Q. And when was the first meeting?  A. The Sheriff.  9 Q. Okay.  And Melvin Dalton and Chris McKlarney and Charlie, I believe.  9 Q. And what was discussed at the meeting?  A. I think that that is when we we really didn't have a chance to speak much. We were probably not going to be allowed to volunteer there, that we were probably not going to have access to the key and not have a key hanging on there is some handwritten notes there.  22 to have access to the key and not have a key hanging on there is some handwritten notes there.  23 check out a key at the disp	23	mean, you can hardly chisel that stuff out of there for	23	2013.		
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but if you just properly wash, and like you would your glass before you drink out of it, if you just washed it every day, you would not get that buildup, and at that time, it was my observation that all of the water bowls, buckets, food bowls, were all all had this residue because they were not being properly cleaned, and then from that particular day, when I was there, when she came to clean, it was quite obvious why; she was just hosing out the bowl and refilling it. It was never cleaning, proper cleaning of the bowls which is also a disease control issue.  MR. STREIKA: Okay. I'd like to mark this as the next Exhibit, please.  MR. STREIKA: Okay. I'd like to mark this beconstiting before we get to Exhibit Number 43, I want Charlie, I believe.  Q. Okay. And the second line of your email, it says, "I am pleading today to engage your help in secting up a second meeting." Do you recall the first meeting?  A. Yes.  A. Yes.  D. Okay. And when was the first meeting?  A. A week or two before this.  A. The Sheriff.  A. The Sheriff.  A. And Melvin Dalton and Chris McKlarney and Charlie, I believe.  Charlie, I believe.  Charlie, I believe.  A. I think that that is when we we really didn't have a chance to speak much. We were just kind of being told at that meeting that we were probably not going to have access to the key and not have a key hanging on there is some handwritten notes there.  A. Hmm-hmm.		Pogo 21		Dogo 22		
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	Christine Link-Ov		s on 04/10/2015 Pages 343
1 7	Page 34	1	Page 36
1 2	we were using the place as a hang out, and that the actual issues that we wanted to talk about were not discussed.	1 2	<pre>MR. GUYNN: Right, but were you asking if there was a long email on Exhibit Number 23.</pre>
		3	MR. STRELKA: Yes.
3 4	Q. I understand. Okay. All right. I'm going to say this, I believe that I marked this particular email	4	MR. GUYNN: This is okay, so this is
5	as an Exhibit earlier.	5	23.
6	MR. GUYNN: It looks familiar, but	6	MR. STRELKA: 23, I gave you a copy of
7	MR. STRELKA: But rather than chasing it	7	whenever we admitted 23, is that 23? This is 23.
8	down, do you mind if we stick another sticker on	8	Okay, 23 was admitted the other day.
9	it?	9	MR. GUYNN: Okay. I didn't bring it.
10	MR. GUYNN: No, that is okay.	10	Okay. I quess that is where our system is
11	rat. Solitate 10, clade 15 stay.	11	different. I don't bring every deposition exhibit
12	(The above-mentioned document was marked as	12	from a week ago with me.
13	Deposition Exhibit Number 44 and entered into the	13	MR. STRELKA: Right, okay.
14	Deposition.)	14	MR. GUYNN: That is fine.
15	Deposition. (	15	(Off the Record.)
16	MR. STRELKA: Off the Record.	16	BY MR. STRELKA:
17	THE STREET OF THE RECORD.	17	Q. I will let you take a moment and review
18	(Off the Record.)	18	Exhibit Number 23. This is the email on the bottom half
19	(OFF CHE RECORD.)	19	of Exhibit Number 23, on the first page, you wrote this
20	BY MR. STRELKA:	20	email that extends to the next couple of pages; is that a
21	Q. All right, please take a look at Exhibit	21	yes?
22	Number 44. Do you recall sending the second email dated	22	A. Yes.
23	January 31, 2013 at 4:27 p.m.?	23	Q. And do you remember the circumstances
24	A. Which one are we look at?	24	surrounding that?
1	Page 35 Q. Exhibit Number 44, the email on the bottom	1	Page 37 A. Yes.
2	half of the page; I just want to know if you recall	2	Q. And what were the circumstances surrounding
3	sending that email.	3	the time where you wrote that letter?
4	A. Yes.	4	A. So the Giles Animal Rescue, the Board
5	Q. Okay. And I'd like to show you what was	5	members, after many attempts to work with the County to
6	been previously marked as Exhibit Number 23, okay, and why	6	resolve matters at the shelter, we felt that, very
7	don't we put this one back in the pile, and put the other	7	strongly, and because of the accusations against the
8	one in the pile, too.	8	volunteers, that we weren't doing thing correctly, that we
9	A. Okay.	9	were actually stealing, doing things we weren't supposed
10	Q. And do you recall sending out the long	10	to be doing, we decided in the best interests of the
11	email that begins in the bottom of that first page and	11	volunteers that we should basically pull away and no
12	extends throughout the rest of the document?	12	longer volunteer at the shelter, because it was obvious
13	A. Yes.	13	that the County did not want to work with us; they wanted
14	Q. Okay. And do you recall the circumstances	14	to do we felt like this was the only way to get help
15	surrounding your issuance of that email?	15	for the animals was to sort of pull back.
16	A. Yes.	16	It was a very tough decision. I cried
17	Q. Can you describe the circumstances?	17	tears over this decision. Our members wholeheartedly
I	A. So	18	agreed that this was the best decision at the time,
18	MR. GUYNN: I'm sorry, I'm confused now.	19	though, and that because the Sheriff was refusing to work
18 19		ı	
	This is a one-page	20	with us, that we needed to pull back and not volunteer at
19		20 21	with us, that we needed to pull back and not volunteer at the shelter, and because they were the staff were
19 20	This is a one-page		
19 20 21	This is a one-page MR. STRELKA: Well, we moved on. I just	21	the shelter, and because they were the staff were

	Christine Link-O		s on 04/10/2015 Pages 384
	Page 38		Page 40
1	ever have any issues with Ms. Perkins allegedly posting	1	Q. Does that refresh your memory in any way?
2	some things on the Internet that you found to be	2	A. Yes, it does.
3	inappropriate about the shelter or about GCAR?	3	Q. Okay.
4	A. You know, stuff like that, I don't really	4	A. So they I believe that one of the
5	get into things on social media.	5	comments was that we were refusing to help, and at that
6	Q. Okay.	6	time, that was not the truth, that we were not allowed to
7	A. If that happened, I don't even remember	7	go to the shelter at the time.
8	it. I put it out of my mind.	8	Q. Okay.
9	Q. Okay. And the Giles County let me see,	9	A. But yet, they were trying to make it in the
10	the Giles shelter, did they have a Facebook page?	10	press look like we it's complicated.
11	A. They do. Well, they still do, yes.	11	Q. Okay. Who is "they"? When you say they
12	Q. Okay. And do you recall making a complaint	12	were trying to make it look like something in the press,
13	about there being unprofessional posts from Chastity on	13	who are you talking about?
14	that Facebook page?	14	A. The people who put this in the paper and
15	A. It is possible.	15	on Facebook, and I don't know who did those, because I'm
16	Q. Okay.	16	not on the other side; I don't know who submitted those
17	A. It's possible. I remember addressing	17	things to the paper, $\ensuremath{\text{I'm}}$ just saying that these are things
18	several unprofessional posts by that occurred several	18	that I observed happened, so I brought them to the
19	different times, but I don't remember who actually posted	19	attention of the County, that we didn't really appreciate
20	those things. I just remember bringing them to the	20	that they were slandering, that we would no longer help
21	attention of the County that they need to be careful what	21	we felt that this was slander against our group because we
22	they are allowing their employees to post.	22	were no longer helping at the shelter.
23	Q. Do you recall some of the messages that	23	Q. And that wasn't true?
24	were posted?	24	A. That was correct.
_	Page 39		Page 41
1	A. Not off the top of my head. I would have	1	Q. Okay. And all right. Do you know a
2	to go back through records to look.	2	Sheryl Helsel? Maybe I'm saying it wrong. She may be an
3	Q. All right. All right, this is a previous	3	investigator for the Department of Agriculture?
4	Exhibit Number 24, a two-page document. That is the last	4	A. Yes.
5	of old Exhibits. Okay. All right. Ma'am, I would like	5	Q. Okay, at some point, you made a, for lack
6	you to take a look at what has been previously been	6	of a better term, complaint to the Department of
7	identified, excuse me, as Exhibit Number 24. Let's look	7	Agriculture; is that right, about the shelter?
8	at the email that begins on the very bottom of the first	8	A. Yes.
9	page and extends to the second page.	9	Q. And why did you do that?
10	A. Okay.	10	A. To be honest with you, I had a very long
11	Q. Do you recall sending this email?	11	discussion with the animal control officer of another
			discussion with the diffici control officer of discuser
12	A. Yes.	12	facility and I said, these are some concerns that I have,
12 13	A. Yes. Q. Okay.		
		12	facility and I said, these are some concerns that I have,
13	Q. Okay.	12 13	facility and I said, these are some concerns that I have, because I wanted to know, you know, how I actually went
13 14	Q. Okay. A. Hmm-hmm.	12 13 14	facility and I said, these are some concerns that I have, because I wanted to know, you know, how I actually went to their shelter so I could learn how, because I knew that
13 14 15	Q. Okay.  A. Hmm-hmm.  Q. And I want you now to focus your attention	12 13 14 15	facility and I said, these are some concerns that I have, because I wanted to know, you know, how I actually went to their shelter so I could learn how, because I knew that shelter was run properly, and I wanted to learn all that I
13 14 15 16	Q. Okay. A. Hmm-hmm. Q. And I want you now to focus your attention on, unfortunately, the what appears to be the body of	12 13 14 15 16	facility and I said, these are some concerns that I have, because I wanted to know, you know, how I actually went to their shelter so I could learn how, because I knew that shelter was run properly, and I wanted to learn all that I could, and in conversation with that animal control
13 14 15 16 17	Q. Okay.  A. Hmm-hmm.  Q. And I want you now to focus your attention on, unfortunately, the what appears to be the body of an email on the top half of the first page.	12 13 14 15 16 17	facility and I said, these are some concerns that I have, because I wanted to know, you know, how I actually went to their shelter so I could learn how, because I knew that shelter was run properly, and I wanted to learn all that I could, and in conversation with that animal control officer, and he was also the person who was the manager of
13 14 15 16 17 18	Q. Okay. A. Hmm-hmm. Q. And I want you now to focus your attention on, unfortunately, the what appears to be the body of an email on the top half of the first page. A. Hmm-hmm.	12 13 14 15 16 17 18	facility and I said, these are some concerns that I have, because I wanted to know, you know, how I actually went to their shelter so I could learn how, because I knew that shelter was run properly, and I wanted to learn all that I could, and in conversation with that animal control officer, and he was also the person who was the manager of that particular shelter, after a long conversation with
13 14 15 16 17 18 19	Q. Okay. A. Hmm-hmm. Q. And I want you now to focus your attention on, unfortunately, the what appears to be the body of an email on the top half of the first page. A. Hmm-hmm. Q. I would like you to read the text here to	12 13 14 15 16 17 18	facility and I said, these are some concerns that I have, because I wanted to know, you know, how I actually went to their shelter so I could learn how, because I knew that shelter was run properly, and I wanted to learn all that I could, and in conversation with that animal control officer, and he was also the person who was the manager of that particular shelter, after a long conversation with him about the concerns that I had seen in the Giles
13 14 15 16 17 18 19 20	Q. Okay. A. Hmm-hmm. Q. And I want you now to focus your attention on, unfortunately, the what appears to be the body of an email on the top half of the first page. A. Hmm-hmm. Q. I would like you to read the text here to yourself.	12 13 14 15 16 17 18 19 20	facility and I said, these are some concerns that I have, because I wanted to know, you know, how I actually went to their shelter so I could learn how, because I knew that shelter was run properly, and I wanted to learn all that I could, and in conversation with that animal control officer, and he was also the person who was the manager of that particular shelter, after a long conversation with him about the concerns that I had seen in the Giles shelter, he actually gave me her business card and he
13 14 15 16 17 18 19 20 21	Q. Okay. A. Hmm-hmm. Q. And I want you now to focus your attention on, unfortunately, the what appears to be the body of an email on the top half of the first page. A. Hmm-hmm. Q. I would like you to read the text here to yourself. A. Okay.	12 13 14 15 16 17 18 19 20 21	facility and I said, these are some concerns that I have, because I wanted to know, you know, how I actually went to their shelter so I could learn how, because I knew that shelter was run properly, and I wanted to learn all that I could, and in conversation with that animal control officer, and he was also the person who was the manager of that particular shelter, after a long conversation with him about the concerns that I had seen in the Giles shelter, he actually gave me her business card and he said, this is who you need to take your concerns to if you

	CIII ISUIIE LIIIK-OV	VCII	0 UII U4/1U/2U13 1 ages 4243
1	Page 42 shelter?	1	Page 44 and retrieve all of their items. We weren't told why; of
2	A. It was Salem.	2	course, we knew that we had already told them that we
3	Q. The Salem shelter?	3	didn't want to volunteer there until changes were made, so
4	A. Yes.	4	my assumption was, oh, they want us to come and get their
5	O. And who was the animal control officer that	5	things because we told them that we would not volunteer
6	you were speaking with?	6	there until things changed, so I went to the shelter with
7	A. I have his business card at home but I	7	Charlie Herbert who retrieved the volunteer things, and
8	didn't bring it with me, but he's now retired.	8	the animal control officer was obviously irate with me,
9	Q. You can't recall his name?	9	and again, I had no idea that any that anything that I
10	A. Not off the top of my head, but I do have	10	sent to Ms. Helsel had been I didn't even know if she
11	his business card.	11	received it; I didn't know what she was doing with the
12	Q. That is okay. All right, so at that point	12	information, I did not know that she had even been to the
13	you determined that you would do this?	13	shelter.
14	A. Yes, and yes, and all of the information	14	All I know is I needed to come to the
15	is information that for three years, in the time that	15	shelter and retrieve our volunteer things and that is what
16	volunteers would come to me and say, this is something	16	I did, with a very friendly manner, and it was quite
17	that I have a concern about, my answer would always be	17	obvious as soon as I got there, something had happened,
18	Number One, I need documentation, it can't be just your	18	because the animal control officer was irate with me, and
19	word, I have to have documentation. If you want me it to	19	very unprofessional, and when I asked, what is wrong, why
20	address a situation, I can't do it without documentation,	20	are you so angry with me, they basically just told me I
21	so for years, every time that a volunteer brought anything	21	needed to leave, I had hurt a lot of people and I needed
22	to me with concerns, and documentation of it, I would file	22	to leave and never come back, that no one in our group
23	it away, and so what I did, once I was encouraged to	23	should ever come back to the shelter.
24	contact Ms	24	Q. Okay.
1	Page 43  Q. Sheryl, her name is written here.	1	Page 45  A. And we had sorry, and so we had a locked
2	A. I have trouble with it every day.	2	cabinet that we kept our supplies in, and we had our own
3	Q. Her name is written there on the email.	3	supply cabinet that we kept locked because of the problem
4	A. So I took it to the Department of	4	where things would constantly disappear, and the irony,
5	Agriculture.	5	things in our locked cabinet that we had a key to never
6	Q. I just wanted you to see her name.	6	disappeared, and this is something that we brought up in
7	A. Yes, Ms. Helsel, so he basically went back	7	meeting where we had accusations about things
8	to my records of things that I had been compiling for over	8	disappearing, but nothing in our own locked cabinet was
9	three years and sent her everything that I had, and I	9	disappearing, so we had dog food and cat foot in the
10	didn't and when I did that, I actually thought that it	10	cabinet because of the reason that we weren't allowed to
11	would be anonymous. I didn't know how things worked like	11	have access to the shelter supplies and we wanted to have
12	this; I had never done had before, and not a single person	12	access to food, and if a person would surrender an animal
13	knew I was doing it. I did it on my own; I didn't tell	13	or they found astray, we needed to feed it and I tried to
14	anyone in our animal rescue group that I was doing it, I $$	14	offer that food to the animal control officer and he
15	did it as a concerned citizen, not as a person who was a	15	refused it and I said, what is going on, why are you
16	member of the animal rescue group, so I want to make that	16	refusing a donation of food, it's just food, take it, keep
17	very clear.	17	it, and that is when the angry statement came that $\ensuremath{\mathtt{I}}$
18	Q. And what happened after you did that? Did	18	should leave and never come back.
19	someone from the department reach out to you, right?	19	Q. Is that Mr. Dalton who said that?
20	A. No, not really.	20	A. No, that was from Frank.
21	Q. Okay.	21	Q. Frank Gough?
22	A. Basically, the first thing that happened is	22	A. Yes.
23	I received a letter from the sheriff's department saying	23	Q. Okay. And you said that he was irate. Do
	i received a recect from the bherrir b department baying		
24	that the animal rescue group needed to come to the shelter	24	you recall any other statements that he made that

Pages 46..49

	Christine Link-Ov	, 011,	s on 04/10/2015 Pages 4649
	Page 46	1	Page 48
1	you've that you thought might be inappropriate?	1	first subject, and I was trying to clarify with her, are
2	A. Well, it was just his whole entire body	2	you the person that I need to give information to, and she
3	language and the fact that he was he had his hand on	3	did clarify yes, send it to me.
4	his guns the whole time in a very scary aggressive body	4	Q. Okay. And I notice on the email heading up
5	language towards me, which was very frightful.	5	top, it says "Attachments."
6	Q. Okay. And all right. So if this was a	6	A. Yes.
7	time line of events, what happened after that?	7	Q. And then it looks to be the file names of
8	A. So again, I still have no idea what is	8	digital pictures or photographs, so you attached
9	really going on; I'm just trying I'm assuming that		photographs this?  A. Yes.
10	something must have happened, and honestly, I don't even remember how I eventually found out oh, I do know. So	10	
11 12		12	Q. These photographs, did you take them yourself or were they taken by other members of GCAR?
13	the next thing, this is how I found out that the person had come and done the inspection at the shelter, is a	13	A. I took some of the photographs; most of
14	reporter called me and she said, oh, yes, I have all of	14	them were taken by other volunteers. Again, as he said,
15	the information that you sent to Ms. Helsel, the State,	15	over the years, whenever someone would come to me with a
16	about the shelter, and that is when I realized that the	16	concern, I would ask for documentation, and they were very
17	inspection had been done, because a reporter provided a	17	good to provide it.
18	copy of the report to me.	18	Q. Okay. And so these these animals that
19	MR. STRELKA: Okay. All right. And I'd	19	you that you are describing here, and each paragraph kind
20	like to have this admitted as the next Exhibit,	20	of describes a different animal, Dixie, Spike, Chastity,
21	please.	21	Crystal, the incidents described regarding these
22	prease.	22	particular animals, do we know when these incidents
23	(The above-mentioned document was marked as	23	occurred?
24	Deposition Exhibit Number 45 and entered into the	24	A. So for each of these I sent her their case
	Deposition maintain named to did dicered into the		ii. bo for each of chebe I balle her cheff cabe
1	Page 47	1	Page 49
1 2	Page 47 Deposition.)	1	numbers for each one, but I don't but I don't see the
2	Deposition.)	2	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had
2 3	Deposition.) BY MR. STRELKA:	2 3	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter
2 3 4	Deposition.)  BY MR. STRELKA:  Q. I'd like you to take a moment and look at	2 3 4	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter records and it would give you the dates, and the case
2 3 4 5	Deposition.)  BY MR. STRELKA:  Q. I'd like you to take a moment and look at what has been labeled as Exhibit Number 45.	2 3 4 5	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter records and it would give you the dates, and the case number for any animal that came in, if it was in the Year
2 3 4 5 6	Deposition.)  BY MR. STRELKA: Q. I'd like you to take a moment and look at what has been labeled as Exhibit Number 45. A. Okay.	2 3 4 5 6	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter records and it would give you the dates, and the case number for any animal that came in, if it was in the Year 2011, the case number would usually be an 11 and then the
2 3 4 5 6 7	Deposition.)  BY MR. STRELKA: Q. I'd like you to take a moment and look at what has been labeled as Exhibit Number 45. A. Okay. Q. And do you recall sending this email?	2 3 4 5 6 7	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter records and it would give you the dates, and the case number for any animal that came in, if it was in the Year 2011, the case number would usually be an 11 and then the number, so you would know which year just by that.
2 3 4 5 6 7 8	Deposition.)  BY MR. STRELKA:  Q. I'd like you to take a moment and look at what has been labeled as Exhibit Number 45.  A. Okay.  Q. And do you recall sending this email?  A. Yes.	2 3 4 5 6	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter records and it would give you the dates, and the case number for any animal that came in, if it was in the Year 2011, the case number would usually be an 11 and then the number, so you would know which year just by that.  Q. Okay. But were all of these animals that
2 3 4 5 6 7	Deposition.)  BY MR. STRELKA:  Q. I'd like you to take a moment and look at what has been labeled as Exhibit Number 45.  A. Okay.  Q. And do you recall sending this email?  A. Yes.  Q. Okay. And why did you send this email?	2 3 4 5 6 7 8	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter records and it would give you the dates, and the case number for any animal that came in, if it was in the Year 2011, the case number would usually be an 11 and then the number, so you would know which year just by that.
2 3 4 5 6 7 8 9	Deposition.)  BY MR. STRELKA:  Q. I'd like you to take a moment and look at what has been labeled as Exhibit Number 45.  A. Okay.  Q. And do you recall sending this email?  A. Yes.  Q. Okay. And why did you send this email?	2 3 4 5 6 7 8	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter records and it would give you the dates, and the case number for any animal that came in, if it was in the Year 2011, the case number would usually be an 11 and then the number, so you would know which year just by that.  Q. Okay. But were all of these animals that were identified, that you were identifying here for the
2 3 4 5 6 7 8 9	Deposition.)  BY MR. STRELKA:  Q. I'd like you to take a moment and look at what has been labeled as Exhibit Number 45.  A. Okay.  Q. And do you recall sending this email?  A. Yes.  Q. Okay. And why did you send this email?  A. Because I felt it was the right thing to	2 3 4 5 6 7 8 9	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter records and it would give you the dates, and the case number for any animal that came in, if it was in the Year 2011, the case number would usually be an 11 and then the number, so you would know which year just by that.  Q. Okay. But were all of these animals that were identified, that you were identifying here for the Department of Agriculture, were these animals that were
2 3 4 5 6 7 8 9 10	Deposition.)  BY MR. STRELKA:  Q. I'd like you to take a moment and look at what has been labeled as Exhibit Number 45.  A. Okay.  Q. And do you recall sending this email?  A. Yes.  Q. Okay. And why did you send this email?  A. Because I felt it was the right thing to do, that animals were not being taken care of.	2 3 4 5 6 7 8 9 10 11	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter records and it would give you the dates, and the case number for any animal that came in, if it was in the Year 2011, the case number would usually be an 11 and then the number, so you would know which year just by that.  Q. Okay. But were all of these animals that were identified, that you were identifying here for the Department of Agriculture, were these animals that were housed at the shelter at the time that Sheriff Millirons
2 3 4 5 6 7 8 9 10 11 12	Deposition.)  BY MR. STRELKA:  Q. I'd like you to take a moment and look at what has been labeled as Exhibit Number 45.  A. Okay.  Q. And do you recall sending this email?  A. Yes.  Q. Okay. And why did you send this email?  A. Because I felt it was the right thing to do, that animals were not being taken care of.  Q. Okay. And had did the and I know	2 3 4 5 6 7 8 9 10 11	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter records and it would give you the dates, and the case number for any animal that came in, if it was in the Year 2011, the case number would usually be an 11 and then the number, so you would know which year just by that.  Q. Okay. But were all of these animals that were identified, that you were identifying here for the Department of Agriculture, were these animals that were housed at the shelter at the time that Sheriff Millirons was elected?
2 3 4 5 6 7 8 9 10 11 12 13	Deposition.)  BY MR. STRELKA:  Q. I'd like you to take a moment and look at what has been labeled as Exhibit Number 45.  A. Okay.  Q. And do you recall sending this email?  A. Yes.  Q. Okay. And why did you send this email?  A. Because I felt it was the right thing to do, that animals were not being taken care of.  Q. Okay. And had did the and I know that you are sending this to the investigator for the	2 3 4 5 6 7 8 9 10 11 12 13	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter records and it would give you the dates, and the case number for any animal that came in, if it was in the Year 2011, the case number would usually be an 11 and then the number, so you would know which year just by that.  Q. Okay. But were all of these animals that were identified, that you were identifying here for the Department of Agriculture, were these animals that were housed at the shelter at the time that Sheriff Millirons was elected?  A. Yes, these are all pets within the past
2 3 4 5 6 7 8 9 10 11 12 13	Deposition.)  BY MR. STRELKA:  Q. I'd like you to take a moment and look at what has been labeled as Exhibit Number 45.  A. Okay.  Q. And do you recall sending this email?  A. Yes.  Q. Okay. And why did you send this email?  A. Because I felt it was the right thing to do, that animals were not being taken care of.  Q. Okay. And had did the and I know that you are sending this to the investigator for the Virginia Department of Agriculture, did she request that	2 3 4 5 6 7 8 9 10 11 12 13 14	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter records and it would give you the dates, and the case number for any animal that came in, if it was in the Year 2011, the case number would usually be an 11 and then the number, so you would know which year just by that.  Q. Okay. But were all of these animals that were identified, that you were identifying here for the Department of Agriculture, were these animals that were housed at the shelter at the time that Sheriff Millirons was elected?  A. Yes, these are all pets within the past three years.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Deposition.)  BY MR. STRELKA:  Q. I'd like you to take a moment and look at what has been labeled as Exhibit Number 45.  A. Okay. Q. And do you recall sending this email? A. Yes. Q. Okay. And why did you send this email? A. Because I felt it was the right thing to do, that animals were not being taken care of. Q. Okay. And had did the and I know that you are sending this to the investigator for the Virginia Department of Agriculture, did she request that you send her this email; do you recall?  A. No. Q. Okay. So you did it just to provide her with this information?  A. I just basically the very first email that I sent her, I may have stated, I have information	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter records and it would give you the dates, and the case number for any animal that came in, if it was in the Year 2011, the case number would usually be an 11 and then the number, so you would know which year just by that.  Q. Okay. But were all of these animals that were identified, that you were identifying here for the Department of Agriculture, were these animals that were housed at the shelter at the time that Sheriff Millirons was elected?  A. Yes, these are all pets within the past three years.  Q. Okay.  A. I'm sorry, three years prior to 2013.  MR. STRELKA: Okay. I'd like to have this marked as the next Exhibit.  (The above-mentioned document was marked as
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Deposition.)  BY MR. STRELKA:  Q. I'd like you to take a moment and look at what has been labeled as Exhibit Number 45.  A. Okay. Q. And do you recall sending this email? A. Yes. Q. Okay. And why did you send this email? A. Because I felt it was the right thing to do, that animals were not being taken care of. Q. Okay. And had did the and I know that you are sending this to the investigator for the Virginia Department of Agriculture, did she request that you send her this email; do you recall?  A. No. Q. Okay. So you did it just to provide her with this information?  A. I just basically the very first email that I sent her, I may have stated, I have information about the shelter and the care of the animals there that I would like to share with you, and I'm going to be sending	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	numbers for each one, but I don't but I don't see the email where I provided the case numbers, and so if you had the case number, then you could look up the shelter records and it would give you the dates, and the case number for any animal that came in, if it was in the Year 2011, the case number would usually be an 11 and then the number, so you would know which year just by that.  Q. Okay. But were all of these animals that were identified, that you were identifying here for the Department of Agriculture, were these animals that were housed at the shelter at the time that Sheriff Millirons was elected?  A. Yes, these are all pets within the past three years.  Q. Okay.  A. I'm sorry, three years prior to 2013.  MR. STRELKA: Okay. I'd like to have this marked as the next Exhibit.  (The above-mentioned document was marked as Deposition Exhibit Number 46 and entered into the

Pages 50..53

1 Q. I would like you to take a moment and look 2 at Exhibit Number 46. Did you write this email? 3 A. Yes. 4 Q. Okay. And do you see the third paragraph? 5 A. Yes. 6 Q. I read this paragraph to Ms. Jones, 7 formerly Ms. Perkins, and she demied all of the incidences 8 contained within this paragraph. Did you personally 9 witness this? 10 A. I was not there that particular day. There 11 were two volunteers that were there, and they called me 12 from the shelter because they were so shocked at the 13 conditions, because they were so shocked at the 14 they never had seen it that way. When they came, arrived 15 that day and they said, what do we need to do, and I said, 16 you need to take some pictures because we need to document 17 this. 18 Q. Okay. 19 A. And that is what happened. They took 19 pictures, and this was the day when the dogs were just 21 coated. I mean, and the pictures cannot justify how had 22 it was that their hair coat was just caked with feces 23 because their kennels had not been cleaned in so long and 24 they were just having to when they needed to rest, they 2 Q. And just so we have this accurate, you 3 yourself have seen the animals at the shelter at the time 4 that Sheriff Millirons was elected sheriff in which the 5 animals were covered in feces, as you have just indicated? 6 A. Yes. 9 Q. Okay, and you have heard about that 10 condition occurring? 11 A. Yes. 12 Q. From other volunteers? 13 A. Yes. 14 Q. Okay. And do you recall an incident in		Christine Link-Ov	V CII	s on 04/10/2015 Pages 5053
at Dishibit Number 46. Did you write this enail?  A. Yes. Coday. And do you see the third paragraph? A. Yes. Coday. And do you see the third paragraph? A. Yes. Coday. And this paragraph to Ms. Jones, Coday. And this paragraph. Did you personally witness this? A. I was not there that particular day. There the from the shelter because they were so shocked at the condition, because they had been there easy times and they never had seen it that way. When they came, arrived this, you need to take some pictures because we need to do, and I said, that day and they said, what do we need to do, and I said, you need to take some pictures because we need to downent. This, Coday.  A. And that is what hoppened. They took pictures, and this was the day when the downent and they were just having in feces.  A. Coday.  Years just laying in feces.  A. Code.  A. Yes.  Coday, and you have heard about that condition necessful?  A. Yes.  Coday, and you have heard about that condition necessful?  A. Yes.  Code, was using a broom strick inappropriately with an animal?  A. Yes. Coday, and you have heard about that Condition necessful?  A. Yes. Coday, and you have heard about that Condition necessful an incident in this which it come to your attention that Ns. Perkins, now Ns. Codes, was using a broom strick inappropriately with an animal?  A. Yes. Codes, was using a broom strick inappropriately with an animal?  A. Yes. Codes, was using a broom strick inappropriately with an animal?  A. Yes. Codes, was using a broom strick inappropriately with an animal?  A. Yes. Codes, was using a broom strick inappropriately with an animal?  A. Yes. Codes, was using a broom strick inappropriately with an animal?  A. Yes. Codes, was using a broom strick inappropriately with an animal?  A. Yes. Codes, was using a broom strick inappropriately with an animal?  A. Yes. Codes, was using a broom strick inappropriately with an animal?  A. Yes. Codes, was using a broom st	1		1	Page 52
A. Yes.  A. Yes.  O. Clay. And do you see the third pursgraph?  A. Yes.  O. I read this paragraph to Ms. Jones.  Tomerty Ms. Perkins, and she denied all of the incidences of containable within this paragraph to Ms. Jones.  Tomerty Ms. Perkins, and she denied all of the incidences of containable within this paragraph. Did you personally witness this?  A. I was not there that particular day. There is the see there, and they called me in the from the shelter because they were so shocked at the continued to the source they were so shocked at the continued to provide this degrad, but her first meme the interest of the source they had been there easiny times and they were just two volunteers that went that. A was and they were because they had been there easing times and they were just easy when the dosp were just to attack the broom bandle or the people who approached the cage, and it was like a dog that weight to attack. I mean, and the pictures cannot justify how bad they were just thaving to — when they needed to rest, they  I were just laying in faces.  O. And just so we have this accurate, you yourself have seen the animals at the shelter at the time that Shriff Millierum sus calcred sheriff in which the saminals were covered in faces, as you have heard about that mind and they were just laying in faces.  New yourself have seen the animals at the shelter at the time that Shriff Millierum sus elected sheriff in which the saminals were covered in faces, any you have heard about that condition cocurring?  A. Yes.  Charly, and you have heard about that the shelter at the time that shriff Millierum sus elected sheriff in which the saminals were covered in faces, any you have heard about that the procedure of the pro		•		BY MR. STRELKA:
0. Oksy. And do you see the third paragraph? 2 A. Yes. 3 Contained within this paragraph to Ms. Jones, 4 Contained within this paragraph. Did you personally 5 witness this? 10 A. I was not there that particular day. There 11 were two volunteers that were there, and they called me 12 contained within this paragraph. Did you personally 13 this. 14 they never had seen it that way. When they came, arrived 15 that day and they said, what do we need to do, and I said, 16 you need to take some pictures because we need to document 17 this. 18 Q. Oksy. 19 A. And that is what happened. They took 19 pictures, and this was the day when the dogs were just 10 their international most been cleaned in so long and 11 they were just having to — when they needed to rest, they 11 were just laying in feces. 12 Q. And just so we have this accurate, you 13 yourself have seen the animals at the shelter at the time 14 that Sheriff Millirous was elected sheriff in which the 15 animals were covered in feces, as you have just indicated? 16 A. Yes. 17 Q. Choo? 18 A. Yes. 19 Q. Gray, and you have board about that 10 condition occurring? 11 A. Yes. 12 Q. From other volunteers? 13 A. Yes. 14 Q. Okoy. And do you recall an incident in 15 which it came to your attention that Ms. Perkins, now Ms. 16 Jones, was using a broom stick inappropriately with an 17 animal? 18 A. Yes. 19 R. STREIKA: Okoy. Let's mark this as the 19 peopsition Exhibit. 20 (The above-menticoed document was marked as 21 (The above-menticoed document was marked as 22 (P. Okay. 23 (Deposition Exhibit. Number 47 and entered into the		•		
5 A. Yes. 6 Q. 1 read this paragraph to Ms. Jones. 7 formerly Ms. Perkins, and she denied all of the incidences 8 contained within this paragraph. Did you personally 9 witness this? 10 A. I was not there that particular day. There 11 were two volunteers that were there, and they called me 12 from the shelter because they were so shocked at the 13 conditions, because they had been there amay times and 14 they never had seen it that way. When they came, arrived 15 that day and they said, what do we need to do.ment 16 you need to take some pictures because we need to document 17 this. 18 Q. Gtay. 19 A. Pard that is what happened. They took 20 pictures, and this was the day when the dogs were just 21 coated. I mean, and the pictures carnot joutify how bed 22 it was that their hair cost was just caked with feces 23 because their kenzels had not been cleaned in so long and 24 they were just laying in feces. 2 Q. And just so we have this accurate, you 23 yourself have seen the snimals at the shelter at the time 24 that Sheriff Millirons was elected sheriff in which the 25 an incident in 26 A. Oros. 27 Q. Gtay. And you have heard about that 28 A. Yes. 29 Q. Gtay. And do you recall an incident in 29 this thin is case to your attention that Ms. Perkins, now Ms. 20 Cay. And while I'm on the subject or 21 and have your attention that Ms. Perkins, now Ms. 22 (The above-menticoed document was marked as 29 Pagosition Robibit Number 47 and entered into the 20 Cay. 21 (The above-menticoed document was marked as 22 (The above-menticoed document was marked as 23 Deposition Robibit Number 47 and entered into the				
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8 contained within this paragraph. Did you personally 9 witness this? 10 A. I was not there that particular day. There 11 were two volunteers that were there, and they called ne 12 from the shelter because they were so shocked at the 13 conditions, because they were so shocked at the 14 they never had seen it that way. When they came, arrived 15 that day and they said, what do we need to do, and I said, 16 you need to take some pictures because we need to document 17 this. 18 Q. (Kay. 19 A. That that is what happened. They took 19 pictures, and this was the day when the dogs were just 20 coated. I mean, and the pictures cannot justify how bad 21 it was that their hair coat was just caked with feces 23 because their kennels had not been cleaned in so long and 24 they were just laying to — when they needed to rest, they 25 Vere just laying in feces, as you have just indicated? 26 A. Croce. 27 Q. Croce? 38 A. Yes. 39 Q. (Kay. 31 yourself have seen the animals at the shelter at the time 4 that Sheriff Millirons was elected sheriff in which the 5 animals were covered in feces, as you have just indicated? 3 A. Yes. 4 Q. (Kay. And do you recall an incident in 5 which it came to your attention that Ms. Perkins, now Ms. 31 Janes, was using a broom stick imageropriately with an 32 A. Yes. 33 Deposition Exhibit. Number 47 and entered into the 34 Deposition Exhibit Number 47 and entered into the 35 Deposition Exhibit Number 47 and entered into the 36 Deposition Exhibit Number 47 and entered into the 37 Deposition Exhibit Number 47 and entered into the 38 Deposition Exhibit Number 47 and entered into the 39 Deposition Exhibit Number 47 and entered into the 40 Deposition Exhibit Number 47 and entered into the 41 Deposition Exhibit Number 47 and entered into the 42 Deposition Exhibit Number 47 and entered into the 43 Deposition Exhibit Number 47 and entered into the 44 Deposition Exhibit Number 47 and entered into the 45 Deposition Exhibit Number 47 and entered into the 46 Deposition Exhibit Number 47 and entered into the 47				
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11 were two volunteers that were there, and they called ne 12 from the shelter because they had been there many times and 13 conditions, because they had been there many times and 14 they never had seen it that way. When they came, arrived 15 that day and they said, what do we need to do, and I said, 16 you need to take some pictures because we need to document 17 this. 18 0. Okay. 19 \( \hat{h}. \) And that is what happened. They took 20 pictures, and this was the day when the dogs were just 21 coated. I mean, and the pictures cannot justify how bad 22 it was that their hair coat was just caked with feces 23 because their kemnels had not been cleaned in so long and 24 they were just laying in feces. 2 Q. And just so we have this accurate, you 2 yourself have seen the animals at the shelter at the time 3 that Sheriff Willicros was elected sheriff in which the 4 animals were covered in feces, as you have just indicated? 6 A. Once. 7 Q. Once? 8 A. Yes. 9 Q. Okay. And do you recall an incident in 9 which it came to your attention that Ms. Penkins, now Ms. 10 Jones, was using a broom stick insperopriately with an 11 animal? 12 Mangle. I could look it up for you if you needed it, 12 Anadas' they were the two volunteers that wert that that 14 they never just because Chastity just continued to provoke this dog and thought that it wan they were just and they were just the his dog that he sail the sail the sail the sail the sage into continued to provoke this dog and thought that it was like a dog that weigh approached the cage, and it was like a dog that weigh approached the cage, and it was like a dog that weigh approached the cage, and it was like and that happened. They took 18 maybe ten pounds, a little Chinathan mix, and she we bragging, and our job was to go and to assess pets for adoption, so if it has aggressive behaves we see the minimal and the province that the the time that the same law to worked side by side with people the behavior, and some dogs but do, when they are afraid they were just they were just				
12 from the shelter because they were so shocked at the 13 conditions, because they had been there many times and 14 they never had seen it that way. When they came, arrived 15 that day and they said, what do we need to do, and I said, 16 you need to take some pictures because we need to document 17 this. 18 Q. Okay. 19 A. And that is what happened. They took 20 pictures, and this was the day when the dogs were just 21 coated. I mean, and the pictures cannot justify how bad 22 it was that their hair coat was just caked with feces 23 because their kemnels had not been cleaned in so long and 24 they were just having to — when they needed to rest, they  1 were just laying in feces. 2 Q. And just so we have this accurate, you 3 yourself have seen the animals at the shelter at the time 4 that Sheriff Millirons was elected sheriff in which the 5 animals were covered in feces, as you have just indicated? 6 A. Once? 7 Q. Once? 8 A. Yes. 9 Q. Okay, and you have heard about that 10 condition occurring? 11 A. Yes. 12 Q. From other volunteers? 13 A. Yes. 14 Q. Okay. And do you recall an incident in 15 which it came to your attention that Ms. Perkins, now Ms. 16 Jones, was using a broom stick inappropriately with an 17 animal? 18 A. Yes. 19 MR. STREIKAS: Okay. Let's mark this as the 19 next Exhibit. 20 (The above-mentioned document was marked as 21 (The above-mentioned document was marked as 22 (The above-mentioned document was marked as 23 Deposition Exhibit Number 47 and entered into the		·		_
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18 Q. Okay.  19 A. And that is what happened. They took 20 pictures, and this was the day when the dogs were just 21 coated. I mean, and the pictures cannot justify how bad 22 it was that their hair coat was just caked with feces 23 because their kennels had not been cleaned in so long and 24 they were just having to when they needed to rest, they 26 Q. And just so we have this accurate, you 27 yourself have seen the animals at the shelter at the time 28 that Sheriff Millirons was elected sheriff in which the 29 animals were covered in feces, as you have just indicated? 30 A. Yes. 31 Q. Okay, and you have heard about that 32 Q. From other volunteers? 33 A. Yes. 44 Q. Okay, And do you recall an incident in 45 which it came to your attention that Ms. Perkins, now Ms. 46 Jones, was using a broom stick inappropriately with an 47 animal? 48 A. Yes. 49 Q. Okay, was using a broom stick inappropriately with an 40 animal? 40 A. Yes. 41 A. Yes. 42 Q. Prom other volunteers? 43 A. Yes. 44 Chastity, can we pull this dog out and see if it sti 45 the same behavior, and she refused to let them, and 46 chastity, can we pull this dog out and see if it sti 47 the same behavior, and she refused to let them, and 48 A. Yes. 49 Q. Okay, and you have heard about that 50 or rescue this dog, it's too mean. 51 Jones, was using a broom stick inappropriately with an 52 animals were covered in feces and noted that Ms. Perkins, now Ms. 53 Jones, had allegedly brought two young boys 54 shelter, who were those volunteers? 55 an invented in very strate the time 56 chastity, can we pull this dog out and see if it sti 57 the same behavior, and she refused to let them, and 58 the same behavior, and she refused to let them, and 59 q. Okay, and you have heard about that 50 the same behavior, and she refused to let them, and 51 is when she pulled out the broom and said, see how me 52 the same behavior, and she refused to let them, and 53 is when she pulled out the broom and said, see how me 54 is entirely and the refused to let them, and 55 identi				
A. And that is what happened. They took pictures, and this was the day when the dogs were just coated. I mean, and the pictures cannot justify how had they were just having to when they needed in so long and they were just having to when they needed to rest, they were just laying in feces.  Page 51  were just laying in feces.  A. Once. A. Once. A. Once. A. Once. C. Once? A. Yes. Q. Okay, and you have heard about that condition occurring? A. Yes. Q. Okay, and you have heard about that which it came to your attention that Ms. Perkins, now Ms. A. Yes. A. Ye				
20 pictures, and this was the day when the dogs were just 21 coated. I mean, and the pictures cannot justify how bad 22 it was that their hair coat was just caked with feces 23 because their kennels had not been cleaned in so long and 24 they were just having to when they needed to rest, they 25 page 51 26 Q. And just so we have this accurate, you 27 yourself have seen the animals at the shelter at the time 28 that Sheriff Millirons was elected sheriff in which the 29 animals were covered in feces, as you have just indicated? 30 A. Once. 31 A. Yes. 42 Q. Once? 43 A. Yes. 44 Q. Okay, and you have heard about that 45 ondition occurring? 46 A. Yes. 47 Q. Order 48 A. Yes. 49 Q. Okay, and you have heard about that 40 Q. Okay, And do you recall an incident in 41 which it came to your attention that Ms. Perkins, now Ms. 40 Jones, was using a broom stick inappropriately with an 41 animal? 42 A. Yes. 43 Deposition Exhibit Number 47 and entered into the 44 protecting, it the aggressive behavior may go away completely, can we pull this dog out of its cage, the space that protecting, it the aggressive behavior may go away completely, can we pull this dog out and see if it still the protecting, it the aggressive behavior may go away completely, and so the volunteers were trying to ask Chastity, can we pull this dog out and see if it still the protecting, it the aggressive behavior may go away completely, and so the volunteers were trying to ask Chastity, can we pull this dog out and see if it still the same behavior, and some dogs just do, when they are afrain the behavior, and some dogs just do, when they are afrain they will guard their cage because that is their spae and they may attack someone who approaches the cage, once you pull the dog out of its cage, the space that protecting, it the aggressive behavior may go away completely, and so the volunteers were trying to ask Chastity, can we pull this dog out and see if it still the same behavior, and some volunteers were trying to ask Chastity, can we p		•		
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it was that their hair coat was just caked with feces because their kennels had not been cleaned in so long and they were just having to when they needed to rest, they  Page 51  were just laying in feces.  Q. And just so we have this accurate, you yourself have seen the animals at the shelter at the time that Sheriff Millirons was elected sheriff in which the animals were covered in feces, as you have just indicated?  A. Once.  Q. Once?  A. Yes.  Q. Okay, and you have heard about that condition occurring?  A. Yes.  Q. Okay. And do you recall an incident in which it came to your attention that Ms. Perkins, now Ms.  Jones, was using a broom stick inappropriately with an animal?  A. Yes.  MR. STREIKA: Okay. Let's mark this as the next Exhibit.  Yes and they may attack someone who approaches the cage, once you pull the dog out of its cage, the space that protecting, it the aggressive behavior may go awa to completely, and so the volunteers were trying to ask for the same behavior, and she refused to let them, and is when she pulled out the broom and said, see how me this thing is' as soon as my daddy comes in, he's put this thing to sleep, we're not letting anybody adopt this came to your attention that Ms. Perkins, now Ms.  Jones, was using a broom stick inappropriately with an animal?  A. Yes.  MR. STREIKA: Okay. Let's mark this as the next Exhibit.  Yes and they may attack someone who approaches the cage, once you pull the dog out of its cage, the space that protecting, it the aggressive behavior may go awa to completely, and so the volunteers were trying to ask for the same behavior, and some dogs just do, when they are and they may attack someone who approaches the cage, once you pull the dog out of its cage, the space that the time they will guard their cage because that is their spand they may attack someone who approaches the cage, once you pull the dog out of its cage, the space that protecting, it the aggressive behavior may go awa to completely, and so the volunteers were trying to the troop				
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Q. And just so we have this accurate, you yourself have seen the animals at the shelter at the time that Sheriff Millirons was elected sheriff in which the animals were covered in feces, as you have just indicated? A. Once.  Q. Once? A. Yes. Q. Okay, and you have heard about that Q. From other volunteers? A. Yes. Q. Okay. And do you recall an incident in which it came to your attention that Ms. Perkins, now Ms. Jones, was using a broom stick inappropriately with an next Exhibit.  A. Yes. A. Yes. B. A. Yes. B. A. Yes. B. A. Yes. C. Okay. And document was marked as Deposition Exhibit Number 47 and entered into the A. Ponce A. Once? A. Once	1	· ·	1	Page 53
yourself have seen the animals at the shelter at the time that Sheriff Millirons was elected sheriff in which the animals were covered in feces, as you have just indicated? A. Once.  A. Once.  Q. Once?  A. Yes.  Q. Okay, and you have heard about that condition occurring?  A. Yes.  Q. From other volunteers?  A. Yes.  Q. Okay. And do you recall an incident in thich it came to your attention that Ms. Perkins, now Ms. Jones, was using a broom stick inappropriately with an animal?  A. Yes.  MR. STREIKA: Okay. Let's mark this as the next Exhibit.  Yourself have seen the animals at the shelter at the time that Sheriff Millirons was elected sheriff in which the that Sheriff Millirons was elected sheriff in which the that Sheriff Millirons was elected sheriff in which the animals were covered in feces, as you have just indicated?  A. Once.  A. Once.  Chastity, can we pull this dog out and see if it sti the same behavior, and she refused to let them, and is when she pulled out the broom and said, see how me this thing is; as soon as my daddy comes in, he's pu this thing to sleep, we're not letting anybody adopt dog or rescue this dog, it's too mean.  Q. Okay. And while I'm on the subject o identification here, the previous Exhibit regarding these individuals that came to the shelter, saw that animals were covered in feces and noted that Ms. Per now Ms. Jones, had allegedly brought two young boys shelter, who were those volunteers?  A. For that particular day?  Q. Yes, ma'am.  Q. Yes, ma'am.  Q. Okay.  A. I would have to go back through my re and check.  Q. Okay.  A. But it happened multiple times with				
4 that Sheriff Millirons was elected sheriff in which the 5 animals were covered in feces, as you have just indicated? 6 A. Once. 7 Q. Once? 8 A. Yes. 9 Q. Okay, and you have heard about that 10 condition occurring? 11 A. Yes. 12 Q. From other volunteers? 13 A. Yes. 14 Q. Okay. And do you recall an incident in 15 which it came to your attention that Ms. Perkins, now Ms. 16 Jones, was using a broom stick inappropriately with an 17 animal? 18 A. Yes. 19 MR. STREIKA: Okay. Let's mark this as the 20 next Exhibit. 21 (The above-mentioned document was marked as 22 (The above-mentioned document was marked as 23 Deposition Exhibit Number 47 and entered into the		-		
5 animals were covered in feces, as you have just indicated? 6 A. Once. 7 Q. Once? 8 A. Yes. 9 Q. Okay, and you have heard about that 10 condition occurring? 11 A. Yes. 12 Q. From other volunteers? 13 A. Yes. 14 Q. Okay. And do you recall an incident in this which it came to your attention that Ms. Perkins, now Ms. 15 Jones, was using a broom stick inappropriately with an animal? 16 Jones, was using a broom stick inappropriately with an next Exhibit. 17 the same behavior, and she refused to let them, and the same behavior, and she refused to let them, and is when she pulled out the broom and said, see how mean. 10 this thing is; as soon as my daddy comes in, he's pulled out the broom and said, see how mean. 11 dog or rescue this dog, it's too mean. 12 Q. Okay. And while I'm on the subject or identification here, the previous Exhibit regarding these individuals that came to the shelter, saw that animals were covered in feces and noted that Ms. Perkins, now Ms. Jones, was using a broom stick inappropriately with an animal? 18 A. Yes. 19 MR. STRELKA: Okay. Let's mark this as the next Exhibit. 20 Next Exhibit. 21 Q. Okay. 22 Q. Okay. 3 Deposition Exhibit Number 47 and entered into the 23 A. But it happened multiple times with				
6 A. Once. 6 Chastity, can we pull this dog out and see if it sti 7 Q. Once? 7 the same behavior, and she refused to let them, and 8 is when she pulled out the broom and said, see how m 9 Q. Okay, and you have heard about that 9 this thing is; as soon as my daddy comes in, he's pu 10 condition occurring? 10 this thing to sleep, we're not letting anybody adopt 11 A. Yes. 12 Q. From other volunteers? 13 A. Yes. 14 Q. Okay. And do you recall an incident in 15 which it came to your attention that Ms. Perkins, now Ms. 16 Jones, was using a broom stick inappropriately with an 17 animal? 18 A. Yes. 19 MR. STRELKA: Okay. Let's mark this as the 20 next Exhibit. 20 (The above-mentioned document was marked as 21 Deposition Exhibit Number 47 and entered into the				
7 Q. Once? 8 A. Yes. 9 Q. Okay, and you have heard about that 10 condition occurring? 11 A. Yes. 12 Q. From other volunteers? 13 A. Yes. 14 Q. Okay. And do you recall an incident in 15 which it came to your attention that Ms. Perkins, now Ms. 16 Jones, was using a broom stick inappropriately with an 17 animal? 18 A. Yes. 19 MR. STRELKA: Okay. Let's mark this as the 20 next Exhibit. 20 Chay. And whole I'm on the subject of animal? 21 A. Yes. 22 (The above-mentioned document was marked as Deposition Exhibit Number 47 and entered into the				
8 A. Yes. 9 Q. Okay, and you have heard about that 9 this thing is; as soon as my daddy comes in, he's pu 10 condition occurring? 11 A. Yes. 12 Q. From other volunteers? 13 A. Yes. 14 Q. Okay. And do you recall an incident in 15 which it came to your attention that Ms. Perkins, now Ms. 16 Jones, was using a broom stick inappropriately with an 17 animal? 18 A. Yes. 19 MR. STRELKA: Okay. Let's mark this as the 20 next Exhibit. 20 (The above-mentioned document was marked as 21 Q. Okay. 22 (The above-mentioned document was marked as 23 Deposition Exhibit Number 47 and entered into the				
9 Q. Okay, and you have heard about that 10 condition occurring? 11 A. Yes. 12 Q. From other volunteers? 13 A. Yes. 14 Q. Okay. And do you recall an incident in 15 which it came to your attention that Ms. Perkins, now Ms. 16 Jones, was using a broom stick inappropriately with an 17 animal? 18 A. Yes. 19 MR. STRELKA: Okay. Let's mark this as the 20 next Exhibit. 20 Okay. And you have heard about that 21 Uhis thing is; as soon as my daddy comes in, he's purious condition occurring? 10 this thing to sleep, we're not letting anybody adopt this thing to sleep, we're not letting anybody adopt the subject of this thing to sleep, we're not letting anybody adopt to dog or rescue this dog, it's too mean. 12 Q. Okay. And while I'm on the subject or distribution here, the previous Exhibit regarding the second has been dog or rescue this dog, it's too mean. 12 Q. Okay. And while I'm on the subject or distribution here, the previous Exhibit regarding the second has been dog or rescue this dog, it's too mean. 13 identification here, the previous Exhibit regarding the second has been dog or rescue this dog, it's too mean. 14 these individuals that came to the shelter, saw that these individuals that came to the shelter, saw that the second has been dog or rescue this dog, it's too mean. 15 which it came to your attention the subject or dog or rescue this dog, it's too mean. 16 now Ms. Jones, had allegedly brought two young boys to shelter, who were those volunteers? 18 A. For that particular day? 19 Q. Yes, ma'am. 20 A. I would have to go back through my recall an incident in the subject or dog or rescue this dog, it's too mean. 20 A. I would have to go back through my recall an incident in the subject or dog or rescue this dog, it's too mean. 21 and check. 22 Q. Okay. 23 Deposition Exhibit Number 47 and entered into the dog or rescue this dog, it's too mean. 24 Q. Okay. And while I'm on the subject or dog or rescue this dog, it's too mean. 25 Q. Okay. And while I'm on the subject or dog or rescue this dog, it's too mean. 26 Q		~		
10 condition occurring?  11 A. Yes.  12 Q. From other volunteers?  13 A. Yes.  14 Q. Okay. And do you recall an incident in  15 which it came to your attention that Ms. Perkins, now Ms.  16 Jones, was using a broom stick inappropriately with an  17 animal?  18 A. Yes.  19 MR. STRELKA: Okay. Let's mark this as the  20 next Exhibit.  20 this thing to sleep, we're not letting anybody adopt  10 this thing to sleep, we're not letting anybody adopt  11 dog or rescue this dog, it's too mean.  12 Q. Okay. And while I'm on the subject or  13 identification here, the previous Exhibit regarding of these individuals that came to the shelter, saw that  15 animals were covered in feces and noted that Ms. Perkins animals were covered in feces and noted that Ms. Perkins animals were those volunteers?  18 A. Yes.  19 Q. Yes, ma'am.  20 A. I would have to go back through my recommended the provious Exhibit Number 47 and entered into the  21 and check.  22 Q. Okay.  23 Deposition Exhibit Number 47 and entered into the  24 A. But it happened multiple times with	-		-	
11 A. Yes. 12 Q. From other volunteers? 13 A. Yes. 14 Q. Okay. And do you recall an incident in 15 which it came to your attention that Ms. Perkins, now Ms. 16 Jones, was using a broom stick inappropriately with an 17 animal? 18 A. Yes. 19 MR. STREIKA: Okay. Let's mark this as the 20 next Exhibit. 21 Q. Okay. And while I'm on the subject or 21 didentification here, the previous Exhibit regarding of these individuals that came to the shelter, saw that 22 next Exhibit. 23 A. For that particular day? 29 A. I would have to go back through my recall and check. 21 and check. 22 (The above-mentioned document was marked as Deposition Exhibit Number 47 and entered into the A. But it happened multiple times with			l	
Q. From other volunteers?  12 Q. Okay. And while I'm on the subject of identification here, the previous Exhibit regarding of identification here, the previous Exhibit regardin			l	
A. Yes.  13 identification here, the previous Exhibit regarding the shelter, saw that 15 which it came to your attention that Ms. Perkins, now Ms. 16 Jones, was using a broom stick inappropriately with an 17 animal? 18 A. Yes. 19 MR. STRELKA: Okay. Let's mark this as the 20 next Exhibit. 20 A. I would have to go back through my re 21 21 and check. 22 (The above-mentioned document was marked as 23 Deposition Exhibit Number 47 and entered into the 24 (The above-mentioned document was marked as 25 Deposition Exhibit Number 47 and entered into the 26 Identification here, the previous Exhibit regarding the these individuals that came to the shelter, saw that 26 animals were covered in feces and noted that Ms. Perkins animals were				
Q. Okay. And do you recall an incident in which it came to your attention that Ms. Perkins, now Ms. Jones, was using a broom stick inappropriately with an animal?  A. Yes.  MR. STREIKA: Okay. Let's mark this as the next Exhibit.  MR. STREIKA: Okay. Let's mark this as the letter was marked as Characteristics.  Deposition Exhibit Number 47 and entered into the  14 these individuals that came to the shelter, saw that animals were covered in feces and noted that Ms. Perkins, now Ms. Jones, had allegedly brought two young boys shelter, who were those volunteers?  18 A. For that particular day? 19 Q. Yes, ma'am. 20 A. I would have to go back through my recall and check. 21 A. But it happened multiple times with		~		
which it came to your attention that Ms. Perkins, now Ms.  Jones, was using a broom stick inappropriately with an animal?  A. Yes.  MR. STREIKA: Okay. Let's mark this as the next Exhibit.  Next Exhibit.  Characteristics of the above-mentioned document was marked as Deposition Exhibit Number 47 and entered into the  animals were covered in feces and noted that Ms. Perkins, now Ms. Jones, had allegedly brought two young boys shelter, who were those volunteers?  A. For that particular day?  Q. Yes, ma'am.  A. I would have to go back through my recapture and check.  22 Q. Okay.  A. But it happened multiple times with				
Jones, was using a broom stick inappropriately with an 16 now Ms. Jones, had allegedly brought two young boys 17 animal? 17 shelter, who were those volunteers?  18 A. Yes. 18 A. For that particular day?  19 MR. STRELKA: Okay. Let's mark this as the 20 A. I would have to go back through my re 21 21 and check.  20 A. I would have to go back through my re 21 and check.  21 and check.  22 Q. Okay.  23 Deposition Exhibit Number 47 and entered into the 23 A. But it happened multiple times with		• •		animals were covered in feces and noted that Ms. Perkins,
17 animal?  18 A. Yes.  19 MR. STRELKA: Okay. Let's mark this as the 20 next Exhibit.  20 next Exhibit.  21 and check.  22 (The above-mentioned document was marked as 22 Q. Okay.  23 Deposition Exhibit Number 47 and entered into the 23 A. But it happened multiple times with		- · · · · · · · · · · · · · · · · · · ·		· ·
18 A. Yes.  19 MR. STRELKA: Okay. Let's mark this as the 20 next Exhibit.  21 21 and check. 22 (The above-mentioned document was marked as 23 Deposition Exhibit Number 47 and entered into the 24 A. For that particular day?  19 Q. Yes, ma'am.  20 A. I would have to go back through my re 21 and check. 22 Q. Okay. 23 But it happened multiple times with				
19 MR. STRELKA: Okay. Let's mark this as the 20 next Exhibit. 20 A. I would have to go back through my re 21 21 and check. 22 (The above-mentioned document was marked as 22 Q. Okay. 23 Deposition Exhibit Number 47 and entered into the 23 A. But it happened multiple times with				
20 next Exhibit. 20 A. I would have to go back through my re 21 21 and check. 22 (The above-mentioned document was marked as 22 Q. Okay. 23 Deposition Exhibit Number 47 and entered into the 23 A. But it happened multiple times with				
21 and check. 22 (The above-mentioned document was marked as 22 Q. Okay. 23 Deposition Exhibit Number 47 and entered into the 23 A. But it happened multiple times with		_		
22 (The above-mentioned document was marked as 22 Q. Okay. 23 Deposition Exhibit Number 47 and entered into the 23 A. But it happened multiple times with				
23 Deposition Exhibit Number 47 and entered into the 23 A. But it happened multiple times with		(The above-mentioned document was marked as		
21 materiale volunteers.				
	4	poposition. /	2-1	materpre vorunceers.

	Christine Link-Ov		s on 04/10/2015 Pages 545
1	Page 54	1	Page 56
1 2	Q. What happened multiple times with multiple volunteers?	1	so some of these pictures may have been taken by you or
		2	other members of GCAR, and some of the pictures may have
3	A. That we would have volunteers there, and	3	been taken by the investigator herself, okay?
4	Chastity would be there with her children or her son or	4	A. Okay.
5	her son and a friend. We weren't even sure. I mean,	5	Q. And so I'm going to give you a big stack of
6	volunteers don't know who Chastity is. We don't know	6	these pictures, all right, and what I'm going to ask you
7	they don't know who her son is, if she has children, who	7	is, see if you can identify what pictures you sent to the
8	those people are, but they would just observe, they were	8	department, and what might help you.
9	young boys, and this is what they were doing.	9	MR. GUYNN: There are a bunch of
10	Q. For what it's worth, I will let you know	10	duplicates.
11	that Ms. Jones testified that she didn't have any	11	MR. STRELKA: Well, blame the Department of
12	children, for what it's worth. This is a little out of	12	Agriculture for sending me a bunch of duplicates.
13	the order, but I will introduce it now for identification	13	MR. GUYNN: Well, I don't know if that
14	purposes. Let's mark that as the next Exhibit.	14	meant
15		15	MR. STRELKA: I will try to pull out the
16	(The above-mentioned document was marked as	16	duplicates and just admit the others for the
17	Deposition Exhibit Number 48 and entered into the	17	Exhibit.
18	Deposition.)	18	MR. GUYNN: I didn't know if that meant
19		19	that these were extra copies of same Exhibit.
20	BY MR. STRELKA:	20	MR. STRELKA: No, they gave me all of that,
21	Q. I just want to know if you recall sending	21	and I just hit "print" this morning.
22	this email.	22	MR. GUYNN: Okay.
23	A. Yes.	23	BY MR. STRELKA:
24	Q. Do you recall, do you see the middle	24	Q. So I would like you to take a look at these
	Page 55		Dogo 57
1	paragraph, it says, "I am an eye witness, that she," she	1	Page 57 pictures here.
2	being Chastity, "came in around 1:30 right as I was	2	A. Okay.
3	leaving. The volunteer who came in at 2:00 reported the	3	Q. And
4	shelter employee was not there when they arrived."	4	MR. GUYNN: Are you going to label them?
5	A. Yes.	5	MR. STRELKA: And the ones that you what
6	O. Did that occur; did situations like that	6	I'm going to do, the ones that she can identify as
7	occur more than once?	7	the ones that she submitted are the ones that I
8	A. Yes.	8	will make an Exhibit, so what I would like you to
9	MR. STRELKA: Okay. Jim, I'm going to hand	9	do is look through these pictures. It might help
10	to you I will have her we're not gooing to		
1 -	to you I will have her we re not gooding to	10	you to even refer to some of the other emails that
11		10	you to even refer to some of the other emails that identified some of the dogs, but I want you to see
11 12	walk through each and every one of these pictures,	11	identified some of the dogs, but I want you to see
12	walk through each and every one of these pictures, but I just want to see if these are the ones that	11 12	identified some of the dogs, but I want you to see if you can tell me which of those pictures you
12 13	walk through each and every one of these pictures, but I just want to see if these are the ones that she sent to the department. I would like her to	11 12 13	identified some of the dogs, but I want you to see if you can tell me which of those pictures you sent.
12 13 14	walk through each and every one of these pictures, but I just want to see if these are the ones that she sent to the department. I would like her to verify that what I'm giving you was actually a	11 12 13 14	identified some of the dogs, but I want you to see if you can tell me which of those pictures you sent.  THE WITNESS: Okay.
12 13 14 15	walk through each and every one of these pictures, but I just want to see if these are the ones that she sent to the department. I would like her to verify that what I'm giving you was actually a whole printout of a Freedom of Information Act	11 12 13 14 15	identified some of the dogs, but I want you to see if you can tell me which of those pictures you sent.  THE WITNESS: Okay.  BY MR. STRELKA:
12 13 14 15 16	walk through each and every one of these pictures, but I just want to see if these are the ones that she sent to the department. I would like her to verify that what I'm giving you was actually a whole printout of a Freedom of Information Act request that we sent to the Department of	11 12 13 14 15 16	identified some of the dogs, but I want you to see if you can tell me which of those pictures you sent.  THE WITNESS: Okay.  BY MR. STRELKA:  Q. All right.
12 13 14 15 16 17	walk through each and every one of these pictures, but I just want to see if these are the ones that she sent to the department. I would like her to verify that what I'm giving you was actually a whole printout of a Freedom of Information Act request that we sent to the Department of Agriculture, and it actually includes a couple of	11 12 13 14 15 16 17	identified some of the dogs, but I want you to see if you can tell me which of those pictures you sent.  THE WITNESS: Okay.  BY MR. STRELKA: Q. All right. A. I sent those.
12 13 14 15 16 17 18	walk through each and every one of these pictures, but I just want to see if these are the ones that she sent to the department. I would like her to verify that what I'm giving you was actually a whole printout of a Freedom of Information Act request that we sent to the Department of Agriculture, and it actually includes a couple of extra documents, some of the emails that we shared	11 12 13 14 15 16 17 18	identified some of the dogs, but I want you to see if you can tell me which of those pictures you sent.  THE WITNESS: Okay.  BY MR. STRELKA: Q. All right. A. I sent those. Q. I will take that.
12 13 14 15 16 17 18 19	walk through each and every one of these pictures, but I just want to see if these are the ones that she sent to the department. I would like her to verify that what I'm giving you was actually a whole printout of a Freedom of Information Act request that we sent to the Department of Agriculture, and it actually includes a couple of extra documents, some of the emails that we shared in there. I haven't culled them out, but most of	11 12 13 14 15 16 17 18 19	identified some of the dogs, but I want you to see if you can tell me which of those pictures you sent.  THE WITNESS: Okay.  BY MR. STRELKA:  Q. All right.  A. I sent those.  Q. I will take that.  A. These.
12 13 14 15 16 17 18 19 20	walk through each and every one of these pictures, but I just want to see if these are the ones that she sent to the department. I would like her to verify that what I'm giving you was actually a whole printout of a Freedom of Information Act request that we sent to the Department of Agriculture, and it actually includes a couple of extra documents, some of the emails that we shared in there. I haven't culled them out, but most of this is just pictures.	11 12 13 14 15 16 17 18 19 20	identified some of the dogs, but I want you to see if you can tell me which of those pictures you sent.  THE WITNESS: Okay.  BY MR. STRELKA:  Q. All right. A. I sent those. Q. I will take that. A. These. Q. Okay.
12 13 14 15 16 17 18 19 20 21	walk through each and every one of these pictures, but I just want to see if these are the ones that she sent to the department. I would like her to verify that what I'm giving you was actually a whole printout of a Freedom of Information Act request that we sent to the Department of Agriculture, and it actually includes a couple of extra documents, some of the emails that we shared in there. I haven't culled them out, but most of this is just pictures.  MR. GUYNN: Okay.	11 12 13 14 15 16 17 18 19 20 21	identified some of the dogs, but I want you to see if you can tell me which of those pictures you sent.  THE WITNESS: Okay.  BY MR. STRELKA: Q. All right. A. I sent those. Q. I will take that. A. These. Q. Okay. A. These. These. These. These
12 13 14 15 16 17 18 19 20 21 22	walk through each and every one of these pictures, but I just want to see if these are the ones that she sent to the department. I would like her to verify that what I'm giving you was actually a whole printout of a Freedom of Information Act request that we sent to the Department of Agriculture, and it actually includes a couple of extra documents, some of the emails that we shared in there. I haven't culled them out, but most of this is just pictures.  MR. GUYNN: Okay.  BY MR. STRELKA:	11 12 13 14 15 16 17 18 19 20 21 22	identified some of the dogs, but I want you to see if you can tell me which of those pictures you sent.  THE WITNESS: Okay.  BY MR. STRELKA:  Q. All right.  A. I sent those.  Q. I will take that.  A. These.  Q. Okay.  A. These. These. These (indicating).
12 13 14 15 16 17 18 19 20 21 22 23	walk through each and every one of these pictures, but I just want to see if these are the ones that she sent to the department. I would like her to verify that what I'm giving you was actually a whole printout of a Freedom of Information Act request that we sent to the Department of Agriculture, and it actually includes a couple of extra documents, some of the emails that we shared in there. I haven't culled them out, but most of this is just pictures.  MR. GUYNN: Okay.  BY MR. STRELKA:  Q. If we go to court, I will pay for some	11 12 13 14 15 16 17 18 19 20 21 22 23	identified some of the dogs, but I want you to see if you can tell me which of those pictures you sent.  THE WITNESS: Okay.  BY MR. STRELKA:  Q. All right.  A. I sent those.  Q. I will take that.  A. These.  Q. Okay.  A. These. These. These These (indicating).  Q. I believe that those might have been taken
12 13 14 15 16 17 18 19 20 21 22	walk through each and every one of these pictures, but I just want to see if these are the ones that she sent to the department. I would like her to verify that what I'm giving you was actually a whole printout of a Freedom of Information Act request that we sent to the Department of Agriculture, and it actually includes a couple of extra documents, some of the emails that we shared in there. I haven't culled them out, but most of this is just pictures.  MR. GUYNN: Okay.  BY MR. STRELKA:	11 12 13 14 15 16 17 18 19 20 21 22	identified some of the dogs, but I want you to see if you can tell me which of those pictures you sent.  THE WITNESS: Okay.  BY MR. STRELKA:  Q. All right. A. I sent those. Q. I will take that. A. These. Q. Okay. A. These. These. These (indicating).

		Christine Link-O	wen	s on 04/10/2015 Pages 586
	_	Page 58		Page 60
1	Α.	Yes, these are investigator photographs.	1	and what is that top photograph?
2	Q.	Okay.	2	A. This is a photograph of an animal custody
3	Α.	And these (indicating).	3	record, and in particular, a female dog that had a
4	Q.	Okay. So why don't you give me the ones	4	severely injured paw.
5	_	't send, okay, and let me see if I have any	5	Q. Okay.
6		aphs that we might be able to separate real	6	A. That came in.
7	-	and then we will make that an Exhibit. Did	7	Q. Okay.
8	you take this		8	A. In June of 2012.
9	Α.	Yes.	9	Q. And why did you take the picture, or why
10	Q.	Okay. Why did you take that? Well, I will	10	did did you take this picture physically, or did
11		until we make this an Exhibit. Let me see if	11	someone else take that picture?
12	_	hing else. Okay, that is all that I wanted.	12	A. This is again an incidence where a
13	So what we wi	ll do, we will get a little paper clip, and	13	volunteer saw something that she was concerned about, and
14	mark those.		14	I asked her to send me documentation, and she provided
15	A.	I think that there is a picture missing.	15	this documentation to me from the shelter. This is a
16	Q.	There is a picture missing?	16	photocopy of shelter records, this page.
17	A.	This dog that is outlined in this report.	17	Q. Okay.
18	That is not h	ere.	18	A. And this is a photograph of the dog.
19	Q.	Okay. What is the dog outlined in that	19	Q. All right, and the next page on that
20	report?		20	exhibit seems to be a single picture; let's go back so I
21	A.	That one (indicating).	21	can describe that for the Record, and there is a single
22	Q.	That is the dog?	22	picture of a white dog on the second page?
23	A.	Yes.	23	A. Yes.
24	Q.	A sad looking Snoopy there?	24	Q. Okay. And let's see.
		Page 59		Page 61
1	A.	Yes.	1	A. Described as a Dalmatian mix.
2	Q.	Okay. And you sent all of these pictures	2	Q. Okay, and what was your question to me a
3	that you have	here?	3	minute ago? You asked me if I had more of these forms.
4	A.	Yes.	4	A. Yes, because for several of these other
5	Q.	To the department?	5	dogs
6	A.	Yes.	6	Q. Hmm-hmm.
7	Q.	Yes?	7	A I had one of these photocopies to go
8	A.	Yes.	8	with it, to show the time frame and the shelter intake
9	Q.	Okay. And I would like to have thank	9	number.
10	you for doing	that. I would like to have these pictures	10	Q. Okay. This does not look like a
11	collectively	identified as the next Exhibit, and here is a	11	photograph; this looked like a xeroxed copy, and that
12	paper clip.		12	should be in your pack, Jim, is that what you referring to
13			13	or is that something different, and let me reflect to you
14		(The above-mentioned photographs were	14	that we send a Freedom of Information Act request to the
15	marke	d as Deposition Exhibit Number 49 and entered	15	Department of Agriculture, kind of asking for the whole
16	into	the Deposition.)	16	shebang, and this is what they gave me.
17			17	A. This is prior this is like after.
18		THE WITNESS: Are there other copies of	18	Q. Okay.
19	these	?	19	A. Well, I only have what I just provided you.
			20	Q. Let me take this away, but you have
20			1	
20 21	BY MR. STRELK	A:	21	identified the other pictures there as pictures that you
	BY MR. STRELK	A: Let's wait. Now we'll talk about that.	21 22	did send to the Department of Agriculture?
21	Q.			
21 22	Q. You've just b	Let's wait. Now we'll talk about that.	22	did send to the Department of Agriculture?

			5 UII U4/1U/2U15 1 ages U2U
1	Page 62 or by other members of your organization while you were	1	Page 64 A. On average, an hour per day or less, if she
2	present at the time?	2	even came in.
3	A. Yes, sorry, there is still some missing.	3	Q. Okay. And you understand that she has
4	Q. Okay.	4	accused members of your organization and you yourself
5	A. Go ahead.	5	about lying about all of this?
6	Q. Well, I will tell you what, I thought that	6	A. I haven't
7	I had everything, but today, or this weekend, if you want	7	Q. I will represent to you that she just
8	to go home and see if there is anything else	8	testified to that.
9	A. Okay.	9	A. Okay.
10	Q any pictures, I would be happy to take	10	Q. Did you ever have any conversations with
11	them and you can email them to me.	11	the investigator?
12	A. Okay.	12	A. No.
13	Q. All right.	13	Q. Are you aware of well, strike that. The
14	MR. GUYNN: To be clear, you are going to	14	sheriff is no longer in control of the shelter; is that
15	provide that to us as an Exhibit?	15	right?
16	MR. STRELKA: Yes, that is the Exhibit	16	A. That is my understanding, yes.
17	right here. I just wanted her to pick from there	17	Q. Okay. And are volunteers currently from
18	and help me to identify, and now this is 49, and	18	GCAR or G.A.R. now assisting with the shelter as they had
19	we will make a copy of that and get it spread	19	been prior to their limited access that was enacted in
20	around.	20	2013?
21	MR. GUYNN: All right.	21	A. Our volunteers have been informed that we
22	MR. STRELKA: Why don't you put 49 back	22	can contact the County administration office and go
23	over here with 48, thank you. I would like this	23	through and complete paperwork and become volunteers at
24	to be Number 50.	24	the shelter again, as of 2014.
<u> </u>	Dog (2)		Dog 65
1	Page 63	1	Page 65 Q. Okay.
2	(The above-mentioned document was marked as	2	A. Volunteers are quite aware of that.
3	Deposition Exhibit Number 50 and entered into the	3	Q. Okay.
4	Deposition.)	4	A. However, none who have been previously
5		5	through this experience of false accusations care to go
6	BY MR. STRELKA:	6	and put themselves in that position again.
7	Q. Do you recall sending this email?	7	MR. STRELKA: Okay. I don't have any
8	A. Yes.	8	further questions. Jim?
1			rarcher queberons: orm:
9	Q. And why did you send this email?	9	rateler quebetons. Onn.
9 10	<ul><li>Q. And why did you send this email?</li><li>A. Again, these are cases that we had seen</li></ul>	9	EXAMINATION BY JIM H. GUYNN, JR., ESQ.
10	A. Again, these are cases that we had seen	10	EXAMINATION BY JIM H. GUYNN, JR., ESQ.
10 11	A. Again, these are cases that we had seen come into the shelter where proper care was not being	10 11	EXAMINATION BY JIM H. GUYNN, JR., ESQ. Q. You mentioned earlier that you had
10 11 12	A. Again, these are cases that we had seen come into the shelter where proper care was not being provided.	10 11 12	EXAMINATION BY JIM H. GUYNN, JR., ESQ. Q. You mentioned earlier that you had volunteered at other shelters, and I think you mentioned
10 11 12 13	A. Again, these are cases that we had seen come into the shelter where proper care was not being provided.  Q. Okay.	10 11 12 13	EXAMINATION BY JIM H. GUYNN, JR., ESQ. Q. You mentioned earlier that you had volunteered at other shelters, and I think you mentioned Montgomery?
10 11 12 13 14	A. Again, these are cases that we had seen come into the shelter where proper care was not being provided.  Q. Okay.  A. And this was documentation of what we	10 11 12 13 14	EXAMINATION BY JIM H. GUYNN, JR., ESQ. Q. You mentioned earlier that you had volunteered at other shelters, and I think you mentioned Montgomery? A. Yes.
10 11 12 13 14 15	A. Again, these are cases that we had seen come into the shelter where proper care was not being provided.  Q. Okay.  A. And this was documentation of what we witnessed as a group of volunteers.	10 11 12 13 14 15	EXAMINATION BY JIM H. GUYNN, JR., ESQ. Q. You mentioned earlier that you had volunteered at other shelters, and I think you mentioned Montgomery? A. Yes. Q. Why did you stop volunteering there?
10 11 12 13 14 15 16	A. Again, these are cases that we had seen come into the shelter where proper care was not being provided.  Q. Okay.  A. And this was documentation of what we witnessed as a group of volunteers.  Q. Okay.	10 11 12 13 14 15 16	EXAMINATION BY JIM H. GUYNN, JR., ESQ.  Q. You mentioned earlier that you had  volunteered at other shelters, and I think you mentioned  Montgomery?  A. Yes.  Q. Why did you stop volunteering there?  A. Because I realized that Giles County had a
10 11 12 13 14 15 16 17	A. Again, these are cases that we had seen come into the shelter where proper care was not being provided.  Q. Okay. A. And this was documentation of what we witnessed as a group of volunteers.  Q. Okay. A. And some of these photographs are what I'm	10 11 12 13 14 15 16 17	EXAMINATION BY JIM H. GUYNN, JR., ESQ. Q. You mentioned earlier that you had volunteered at other shelters, and I think you mentioned Montgomery? A. Yes. Q. Why did you stop volunteering there? A. Because I realized that Giles County had a need, and I live in Giles, so why am I not helping Giles
10 11 12 13 14 15 16 17 18	A. Again, these are cases that we had seen come into the shelter where proper care was not being provided.  Q. Okay. A. And this was documentation of what we witnessed as a group of volunteers. Q. Okay. A. And some of these photographs are what I'm describing in this email.	10 11 12 13 14 15 16 17 18	EXAMINATION BY JIM H. GUYNN, JR., ESQ.  Q. You mentioned earlier that you had  volunteered at other shelters, and I think you mentioned  Montgomery?  A. Yes.  Q. Why did you stop volunteering there?  A. Because I realized that Giles County had a  need, and I live in Giles, so why am I not helping Giles  County pets, and that is what I felt moved to do.  Q. And if I suggested to you that they don't
10 11 12 13 14 15 16 17 18 19	A. Again, these are cases that we had seen come into the shelter where proper care was not being provided.  Q. Okay. A. And this was documentation of what we witnessed as a group of volunteers. Q. Okay. A. And some of these photographs are what I'm describing in this email. Q. Okay. And given your observations and the	10 11 12 13 14 15 16 17 18	EXAMINATION BY JIM H. GUYNN, JR., ESQ.  Q. You mentioned earlier that you had  volunteered at other shelters, and I think you mentioned  Montgomery?  A. Yes.  Q. Why did you stop volunteering there?  A. Because I realized that Giles County had a  need, and I live in Giles, so why am I not helping Giles  County pets, and that is what I felt moved to do.  Q. And if I suggested to you that they don't
10 11 12 13 14 15 16 17 18 19 20	A. Again, these are cases that we had seen come into the shelter where proper care was not being provided.  Q. Okay. A. And this was documentation of what we witnessed as a group of volunteers. Q. Okay. A. And some of these photographs are what I'm describing in this email. Q. Okay. And given your observations and the reported observations of your members of your	10 11 12 13 14 15 16 17 18 19 20	EXAMINATION BY JIM H. GUYNN, JR., ESQ.  Q. You mentioned earlier that you had  volunteered at other shelters, and I think you mentioned  Montgomery?  A. Yes.  Q. Why did you stop volunteering there?  A. Because I realized that Giles County had a  need, and I live in Giles, so why am I not helping Giles  County pets, and that is what I felt moved to do.  Q. And if I suggested to you that they don't  want you back at the Montgomery County shelter, what would
10 11 12 13 14 15 16 17 18 19 20 21	A. Again, these are cases that we had seen come into the shelter where proper care was not being provided.  Q. Okay.  A. And this was documentation of what we witnessed as a group of volunteers.  Q. Okay.  A. And some of these photographs are what I'm describing in this email.  Q. Okay. And given your observations and the reported observations of your members of your organization, sitting here today, can you tell me how many	10 11 12 13 14 15 16 17 18 19 20 21	EXAMINATION BY JIM H. GUYNN, JR., ESQ.  Q. You mentioned earlier that you had  volunteered at other shelters, and I think you mentioned  Montgomery?  A. Yes.  Q. Why did you stop volunteering there?  A. Because I realized that Giles County had a  need, and I live in Giles, so why am I not helping Giles  County pets, and that is what I felt moved to do.  Q. And if I suggested to you that they don't  want you back at the Montgomery County shelter, what would you say?

	Christine Link-Ov	ven	s on 04/10/2015 Pages 6669
	Page 66		Page 68
1	emails to the Department of Agriculture, you had told the	1	Q. Okay.
2	volunteers that they needed to document these things?	2	A. And I know the family, and I know their
3	A Yes.	3	finances, and they are they already had a female that
4	Q. Did I understand that correctly?	4	they were not getting spayed and neutered because they
5	A. Yes.	5	could not afford it, so I gave them a certificate to get
6	Q. Now, what kind of documentation are you	6	the newly adopted dog and the female that they had for
7	talking about?	7	eight years spayed.
8	A. I asked them to write down exactly what	8	Q. Had you had any contact with them prior to
9	they observed, the date that they said were there, what	9	that instance about making certificates available to them?
10	they observed, and any pictures that they had.	10	A. Never.
11	Q. Okay. And so your okay, so the pictures	11	Q. Okay. Do you know how it is that they came
12	would be to verify what they saw?	12	to contact you?
13	A. Correct.	13	A. It's known in the community that I do this
14	Q. But the fact that they wrote something down	14	work, and we advertise throughout the community to contact us if you need spay and neuter assistance, and they
15 16	does not verify what they saw, does it?  A. I can't answer that.		friends of friends, they knew that I was president of the
17		16   17	animal rescue, so that is why they sought me out to see
18	Q. Okay. Well, do you accept everything that is written as true?	18	they had heard that animal rescue could help provide spay
19	A. I have worked with the volunteers, and I	19	and neuter assistance, and knowing that I was president of
20	trusted them and I did take their word for it, that they	20	the group, that is why they sought me and asked me that
21	were telling the truth.	21	personally, if I would help them.
22	Q. But you needed documentation?	22	Q. Okay.
23	A. Yes, because I think that that is what is	23	A. And then he said, where did you get the
24	the most helpful, and you can always have anything that	24	dog, and that is when the conversation started.
	the most helpfully and you can always have anything and		dog, and that is midi the conversation stateed.
1	Page 67 you can have in writing, because I three years from now	1	Page 69 Q. All right. If I understand correctly, dogs
1 2	when you have to have a conversation about what happened	1 2	Q. All right. If I understand correctly, dogs that are not adopted at shelters or not rescued are
3	three years ago, it helps if you have that documentation	3	euthanized?
4	to help you remember, that the facts are kept straight.	4	A. Correct.
5	Q. And you indicated that let me make sure	5	Q. Isn't it better that this dog was adopted
6	of my note. I think you said that many of your volunteers	6	out, even though the family didn't have \$150, in a
7	did not know who Chastity was?	7	situation where they could get the dog spayed by the
8	A. They recognized her face as she is the	8	certificate than to be euthanized?
9	kennel helper hired by the County; they didn't actually	9	A. I would disagree with that, and one of the
10	know what her name was or who she was as a person, that is	10	reasons why our volunteers wholeheartedly uphold the Giles
11	what I was referring to, or anything about her personally.	11	County regulation is because we understand that when they
12	Q. On the on the example that you gave, and	12	take this pet home, if they can't afford spay and neuter,
13	I can't tell you what Exhibit it was, about not collecting	13	it's going to reproduce, and then when there is already
14	the deposit?	14	a pet overpopulation problem; we would rather see a pet
15	A. Yes.	15	humanely euthanized than to continue this overpopulation
16	Q. The folks then called you and said, we	16	problem where dogs are just going to die because there is
17	don't have the money to get this dog spayed?	17	lack of food, lack of care, because of overpopulation.
18	A. Correct.	18	Q. Okay.
19	Q. All right.	19	A. I have personally assisted with euthanizing
20	A. Actually, it was in person, not a phone	20	many dogs because there is no place for them. I feel very
21	call.	21	passionate about this.
22	Q. Okay, so would you agree with me that they	22	Q. Okay. I know nothing about it, so I'm
23	wouldn't have had \$150 to make a deposit, either?	23	not I'm not, you know, I'm just curious about the
24	A. That is correct. They told me so.	24	concept.

Q. Now, you indicated that people had, in your group, had suggested that these adoptions without paying the deposit were done for friends of folks that worked at the deposit were done for friends of folks that worked at the dog shelter?  A. No, not people that worked there; the staff, we felt, were letting certain animals be adopted by their friends and family without the the friends and many years who family of the staff were being allowed to adopt without years a common was a common practically as a common practically as a correctly, and the family about the same thing?  A. Sorry, I must have misunderstood you.  13 correctly, and Q. I said employees, you said staff. Are we talking about the same thing?  A. Yes, we are.  Q. So who is the staff at the shelter?  A. That would be animal control officers and the diles of the property	ts under Oath and you have no basis for it?  I'm telling you what we observed.  But what you testified today was that you riends of the staff were adopting without it, and you just told me that you had no whatsoever?  This is the this is the volunteers over would come to us, who would come to it elief with the volunteers that this was a se, but we could not prove it, and that is  Now, you were if I am reading this I help me if I'm not, take a look at Exhibit you recall testifying about these emails?  Yes.  And I'm trying to make sure that I
2 Q. Now, you indicated that people had, in your 3 group, had suggested that these adoptions without paying 4 the deposit were done for friends of folks that worked at 5 the dog shelter? 5 making a deposit 6 A. No, not people that worked there; the 6 basis for that 7 staff, we felt, were letting certain animals be adopted by 8 their friends and family without the the friends and 9 family of the staff were being allowed to adopt without 9 was a common 10 doing the spay and neuter deposit. 10 common practic 11 Q. I'm confused. I thought that that is what 11 what I stated 12 I asked. 12 Q. 13 A. Sorry, I must have misunderstood you. 13 correctly, and 14 Q. I said employees, you said staff. Are we 14 Number 44. Do 15 talking about the same thing? 15 A. 16 Q. 17 Understand. 18 A. That would be animal control officers and 18 had the Giles 19 Chastity at that time period. 19 longer going to 20 Q. Okay, and what is the basis for that rumor? 20 A. 21 the second page	I'm telling you what we observed.  But what you testified today was that you riends of the staff were adopting without it, and you just told me that you had no whatsoever?  This is the this is the volunteers over would come to us, who would come to it elief with the volunteers that this was a we, but we could not prove it, and that is  Now, you were if I am reading this I help me if I'm not, take a look at Exhibit you recall testifying about these emails?  Yes.
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19 Chastity at that time period. 20 Q. Okay, and what is the basis for that rumor? 21 A. Because when the volunteers would go and we 21 the second page.	s of these emails, when the decision or
20 Q. Okay, and what is the basis for that rumor? 20 A. 21 A. Because when the volunteers would go and we 21 the second page	Animal Rescue been advised that they were no
21 A. Because when the volunteers would go and we 21 the second page	o be allowed to volunteer at the shelter?
	I'm trying to remember, because I don't see
22 would see that the dog had been adopted, we would go 22 please.	e; I'm sorry, ask the question again,
23 through the paperwork, because all of the paperwork is in 23 Q.	I'm trying to figure out if these are the
24 a certain bin on the desk where we all have access to 24 emails that in	dicate that this is about the time that the
Page 71  1 paperwork, and one reason why there is access to the 1 Giles Animal F	Page 73 escue volunteers were no longer being
	unteer at the shelter.
3 I lost a dog, we can flip through records and say, oh, 3 A.	Okay, yes.
4 yes, I do see it came in three weeks ago, but that is what 4 Q.	Okay. And from that time until 2014 when
	numed the operational responsibility for the
	Giles Animal Rescue volunteers ever allowed
7 Q. Okay. 7 back in to vo.	
	There was a short period of time where we
	and this was because the volunteers
10 suppose is the right word, we would see that they were 10 requested it,	we asked that staff be present before we
11 being adopted and but we didn't see any receipt for the 11 send volunteer	s, and that way, there would be this
	that the for when the volunteers were
12 spay and neuter deposit. 12 accountability	
	felt that there would be no more false
13 Q. Okay. 13 there, that we	staff would be there while we were there
13 Q. Okay. 13 there, that we	
13 Q. Okay. 13 there, that we 14 A. You could see that there was adoption 14 accusations in	
13 Q. Okay.  14 A. You could see that there was adoption  15 paperwork but not necessarily always a receipt for the  16 volunteering.	staff would be there while we were there
13 Q. Okay.  14 A. You could see that there was adoption  15 paperwork but not necessarily always a receipt for the  16 deposit.  13 there, that we like the	staff would be there while we were there  Can you give me the dates of that?  Not without going back through emails to
Q. Okay.  13 there, that we labeled the paperwork but not necessarily always a receipt for the labeled deposit.  14 deposit.  15 paperwork but not necessarily always a receipt for the labeled labele	staff would be there while we were there  Can you give me the dates of that?  Not without going back through emails to
Q. Okay.  13 there, that we have the paperwork but not necessarily always a receipt for the paperwork but not necessarily always a receipt for the deposit.  16 deposit.  17 Q. And how does that get to them being friends pake a time 1: 18 make a time 1: 19 A. Again, this is our belief of what was 19 Q.	can you give me the dates of that?  Not without going back through emails to me for you.
Q. Okay.  13 there, that we have the proof for it.  Q. Okay.  14 A. You could see that there was adoption  15 paperwork but not necessarily always a receipt for the have proof for it.  Q. And how does that get to them being friends  16 Q. 17 A. 18 of the staff?  18 make a time have proof for it.  Q. You don't have any basis for it, that they  10 there, that we have accusations if the paperwork is accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusations if the paperwork but not necessarily always a receipt for the have accusation in the paperwork but not necessarily always a receipt for the have accusation in the have been accusation as a supplied to the have accusation and the paperwork but not necessarily always a receipt for the have ac	Can you give me the dates of that?  Not without going back through emails to ne for you.  Okay. Now, when you talked about going
Q. Okay.  13 there, that we have the proof for it.  14 A. You could see that there was adoption 14 accusations if 15 paperwork but not necessarily always a receipt for the 15 volunteering.  16 deposit.  17 Q. And how does that get to them being friends 17 A.  18 of the staff?  19 A. Again, this is our belief of what was 19 Q.  20 you had to go	Can you give me the dates of that?  Not without going back through emails to ne for you.  Okay. Now, when you talked about going and retrieve food and other items that
Q. Okay.  13 there, that we have the proof for it.  Q. Okay.  14 A. You could see that there was adoption  15 paperwork but not necessarily always a receipt for the have proof for it.  Q. And how does that get to them being friends  16 Q. 17 A. 18 of the staff?  18 make a time have proof for it.  Q. You don't have proof for it, that they  20 you had to go  21 Q. You don't have any basis for it, that they  21 animal rescue.	Can you give me the dates of that?  Not without going back through emails to ne for you.  Okay. Now, when you talked about going and retrieve food and other items that

	Christine Link-Owens on 04/10/2015 Pages 7477				
		Page 74		Page 76	
1	=	no longer going to volunteer, right?	1	Q. And have you had any individual contact	
2	Α.	Well, if you look at this documentation, I	2	with Mr. Dunn to discuss these issues?	
3		it in May that we decided to pull back and	3	A. No.	
4	not send volu	nteers, even though staff would be there.	4	Q. Okay, do you know of anybody from your	
5	Q.	Okay.	5	group that has had individual contact with Mr. Dunn?	
6	A.	And then we were told to come and get our	6	A. No, not that I am aware of.	
7	things, not u	ntil September.	7	Q. Okay. In the course of your discussions	
8	Q.	Okay.	8	well, let me scratch that. Let me go back and put in a	
9	A.	It was actually on September 11th, when I	9	foundation. You had at least one meeting with Sheriff	
10	went there.		10	Millirons, didn't you?	
11	Q.	Okay. When you say that you remember the	11	A. Yes.	
12	date, because	of September 11th?	12	Q. And was there more than one meeting?	
13	A.	Yes.	13	A. Yes.	
14	Q.	The significance of September 11th?	14	Q. How many were there?	
15	A.	Yes.	15	A. There were a couple of meetings where it	
16	Q.	And the Twin Towers?	16	was just me in his office; that has been several years	
17	A.	Yes.	17	ago.	
18	Q.	Okay. All right, you were asked about who	18	Q. Okay.	
19	from the Coun	ty told you to contact the Sheriff, and you	19	A. And then our vice president also met with	
20	indicated tha	t the previous president of G.A.R. had told	20	him just one on one a couple of times.	
21	you that?		21	Q. Okay, I'm just asking about your meetings	
22	A.	Yes.	22	with him.	
23	Q.	Okay. And did you make any attempt other	23	A. All right, and then a few times our group,	
24	than what is	shown in the emails to talk with anybody at	24	myself and the vice president, and on one occasion April	
1	the County ab	Page 75 out the animal shelter?	1	Page 77 Lowry, our coordinator, also was at a meeting, so we	
2	Α.	I had been to the Board of Supervisors'	2	had we've had several meetings over the last three	
3		shared information with various volunteers	3	years.	
4	•	speak with the Board of Supervisors members	4	Q. Okay, so when you said "several years," you	
5		roughout the years also.	5	meant the last three years?	
6	Q.	When you say "had tried to," did they	6	A. Yes.	
7	succeed?	raidi for but that offer out off	7	Q. Was there any older than that?	
8	A.	Yes.	8	A. Other volunteers before me had also met	
9	Q.	And did you have any contact with	9	with the Sheriff.	
10		ard of Supervisors members?	10	Q. Okay.	
TO	IIIdividdai bo	ard or supervisors members:			
11	7\	Just at meetings	1 11		
11 12	Α.	Just at meetings.	11	A. Concerning the staff and the things that	
12	Q.	Okay.	12	A. Concerning the staff and the things that weren't being done, or were being done inappropriately,	
12 13	Q. A.		12 13	A. Concerning the staff and the things that weren't being done, or were being done inappropriately, yes.	
12 13 14	Q. A. things.	Okay. When I would go to meetings and discuss	12 13 14	A. Concerning the staff and the things that weren't being done, or were being done inappropriately, yes.  Q. And if I recall your testimony, the	
12 13 14 15	Q. A. things.	Okay.	12 13 14 15	A. Concerning the staff and the things that weren't being done, or were being done inappropriately, yes.  Q. And if I recall your testimony, the organization was formed in 1999 because of that concern	
12 13 14 15 16	Q. A. things. Q. group?	Okay. When I would go to meetings and discuss You spoke with them in the meeting as a	12 13 14 15 16	A. Concerning the staff and the things that weren't being done, or were being done inappropriately, yes.  Q. And if I recall your testimony, the organization was formed in 1999 because of that concern that things weren't being done correctly at the pound I	
12 13 14 15 16 17	Q. A. things. Q. group? A.	Okay. When I would go to meetings and discuss	12 13 14 15 16 17	A. Concerning the staff and the things that weren't being done, or were being done inappropriately, yes.  Q. And if I recall your testimony, the organization was formed in 1999 because of that concern that things weren't being done correctly at the pound I mean the shelter, I'm sorry.	
12 13 14 15 16 17 18	Q. A. things. Q. group? A.	Okay. When I would go to meetings and discuss You spoke with them in the meeting as a It was at the public meetings that they	12 13 14 15 16 17 18	A. Concerning the staff and the things that weren't being done, or were being done inappropriately, yes.  Q. And if I recall your testimony, the organization was formed in 1999 because of that concern that things weren't being done correctly at the pound I mean the shelter, I'm sorry.  A. Yes, yes, and at that time because of our	
12 13 14 15 16 17 18	Q. A. things. Q. group? A. have.	Okay. When I would go to meetings and discuss You spoke with them in the meeting as a	12 13 14 15 16 17 18 19	A. Concerning the staff and the things that weren't being done, or were being done inappropriately, yes.  Q. And if I recall your testimony, the organization was formed in 1999 because of that concern that things weren't being done correctly at the pound I mean the shelter, I'm sorry.  A. Yes, yes, and at that time because of our concerns, the community got together and we built a newer	
12 13 14 15 16 17 18 19 20	Q. A. things. Q. group? A. have. Q. comment?	Okay. When I would go to meetings and discuss  You spoke with them in the meeting as a  It was at the public meetings that they  They have the opportunity for public	12 13 14 15 16 17 18 19 20	A. Concerning the staff and the things that weren't being done, or were being done inappropriately, yes.  Q. And if I recall your testimony, the organization was formed in 1999 because of that concern that things weren't being done correctly at the pound I mean the shelter, I'm sorry.  A. Yes, yes, and at that time because of our concerns, the community got together and we built a newer and better shelter.	
12 13 14 15 16 17 18 19 20 21	Q. A. things. Q. group? A. have. Q. comment?	Okay. When I would go to meetings and discuss You spoke with them in the meeting as a It was at the public meetings that they They have the opportunity for public Yes.	12 13 14 15 16 17 18 19 20 21	A. Concerning the staff and the things that weren't being done, or were being done inappropriately, yes.  Q. And if I recall your testimony, the organization was formed in 1999 because of that concern that things weren't being done correctly at the pound I mean the shelter, I'm sorry.  A. Yes, yes, and at that time because of our concerns, the community got together and we built a newer and better shelter.  Q. Is that the one being used now?	
12 13 14 15 16 17 18 19 20 21 22	Q. A. things. Q. group? A. have. Q. comment? A.	Okay. When I would go to meetings and discuss  You spoke with them in the meeting as a  It was at the public meetings that they  They have the opportunity for public	12 13 14 15 16 17 18 19 20 21 22	A. Concerning the staff and the things that weren't being done, or were being done inappropriately, yes.  Q. And if I recall your testimony, the organization was formed in 1999 because of that concern that things weren't being done correctly at the pound I mean the shelter, I'm sorry.  A. Yes, yes, and at that time because of our concerns, the community got together and we built a newer and better shelter.	
12 13 14 15 16 17 18 19 20 21	Q. A. things. Q. group? A. have. Q. comment?	Okay. When I would go to meetings and discuss You spoke with them in the meeting as a It was at the public meetings that they They have the opportunity for public Yes.	12 13 14 15 16 17 18 19 20 21	A. Concerning the staff and the things that weren't being done, or were being done inappropriately, yes.  Q. And if I recall your testimony, the organization was formed in 1999 because of that concern that things weren't being done correctly at the pound I mean the shelter, I'm sorry.  A. Yes, yes, and at that time because of our concerns, the community got together and we built a newer and better shelter.  Q. Is that the one being used now?	

	Christine Link-Owens on 04/10/2015 Pages 7				
		Page 78			Page 80
1	Α.	I would have to go back through the	1	MR. GUYNN: that the court reporter is	
2	records.		2	going to prepare, and after she prepares it, she	
3	Q.	Approximately. Was it mid 2000's?	3	can send it to you along with a signature page and	
4	Α.	Well, 2003, I can't remember.	4	errata sheet and you read it, and within 30 days,	
5	Q.	Okay.	5	you will have to return it, and you can fill out	
6	A.	To be honest, I would have to look it up.	6	the errata sheet and change things that you want	
7	Q.	Is it fair to say that it was well before	7	to change if you need to, or you can authorize the	
8	Sheriff Milli	rons became Sheriff?	8	court reporter as a notary public to just sign	
9	A.	Honestly, I don't know how long he's been	9	your name to it, and if you want a copy of your	
10	Sheriff.		10	deposition testimony, one of us will get it for	
11	Q.	I will tell you he started in 2008?	11	you.	
12	A.	Okay, likely prior to that.	12	THE WITNESS: Okay.	
13	Q.	Did you ever meet with Sheriff Altizer?	13	MR. GUYNN: But you will save yourself a	
14	A.	No.	14	lot of time and you don't have to sign it, is the	
15	Q.	Do you know if anybody from your group did?	15	bottom line, so it's really up to you.	
16	A.	I do not.	16	MR. STRELKA: In my experience, most people	
17	Q.	Okay. Other than your comments to the	17	just waive.	
18	Board of Supe	rvisors in public comment, did you have	18	THE WITNESS: Okay.	
19	meetings with	I will say non-elected officials in the	19	MR. STRELKA: Are you fine waiving?	
20	County, staff	, Chris McKlarney, Kevin Belcher, someone	20	MR. GUYNN: I will send you a copy of the	
21	like that?		21	transcript so you can have it and read it.	
22	A.	Our volunteers did go to the manager of the	22	THE WITNESS: I just want to make sure that	
23	Greenbrier wh	o was the person that actually that	23	I understand. Do I need to do anything else?	
24	Chastity actu	ally did work for, who was the controller.	24	MR. STRELKA: No.	
		D 50			D 01
1	Q.	Page 79 Okay.	1	MR. GUYNN: Not if you waive.	Page 81
2	A.	They had our volunteers had gone to Mr.	2	THE WITNESS: So you are saying that I can	
3	Duncan and sa	id, you know, you have an employee, we have	3	choose now to state that I want to waive?	
4					
	these concern	s that they are not doing their job, they are	4	MR. STRELKA: Yes, ma'am.	
5			4 5		
5		s that they are not doing their job, they are for work they are not doing.  Okay. And when you met with the Sheriff in		MR. STRELKA: Yes, ma'am. THE WITNESS: Yes.	
	getting paid Q.	for work they are not doing.	5	MR. STRELKA: Yes, ma'am.	
6 7	getting paid Q.	for work they are not doing.  Okay. And when you met with the Sheriff in	5 6	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.	
6	getting paid Q. his office, w	for work they are not doing.  Okay. And when you met with the Sheriff in	5 6 7	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?	
6 7 8	getting paid Q. his office, w and him?	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you	5 6 7 8	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.	
6 7 8 9	getting paid Q. his office, w and him? A. two of us.	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you  On two occasions, not it was just the	5 6 7 8	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	
6 7 8 9 10	getting paid Q. his office, w and him? A.	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you	5 6 7 8 9	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	
6 7 8 9 10 11 12	getting paid Q. his office, w and him? A. two of us. Q. A.	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you  On two occasions, not it was just the  Okay.  There was one occasion when Chris McKlarney	5 6 7 8 9 10 11	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	
6 7 8 9 10 11 12 13	getting paid Q. his office, w and him? A. two of us. Q. A. was present,	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you  On two occasions, not it was just the  Okay.  There was one occasion when Chris McKlarney and Charlie Herbert.	5 6 7 8 9 10 11 12 13	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	
6 7 8 9 10 11 12 13	getting paid Q. his office, w and him? A. two of us. Q. A. was present, Q.	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you  On two occasions, not it was just the  Okay.  There was one occasion when Chris McKlarney and Charlie Herbert.  All right. I'm sorry, Charlie Herbert?	5 6 7 8 9 10 11 12 13	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	
6 7 8 9 10 11 12 13 14	getting paid Q. his office, w and him? A. two of us. Q. A. was present, Q. I'm just repe	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you  On two occasions, not it was just the  Okay.  There was one occasion when Chris McKlarney and Charlie Herbert.  All right. I'm sorry, Charlie Herbert? ating that for the court reporter.	5 6 7 8 9 10 11 12 13 14 15	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	
6 7 8 9 10 11 12 13 14 15	getting paid Q. his office, w and him? A. two of us. Q. A. was present, Q.	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you  On two occasions, not it was just the  Okay.  There was one occasion when Chris McKlarney and Charlie Herbert.  All right. I'm sorry, Charlie Herbert? ating that for the court reporter.  Yes.	5 6 7 8 9 10 11 12 13 14 15 16	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	
6 7 8 9 10 11 12 13 14 15 16 17	getting paid Q. his office, w and him? A. two of us. Q. A. was present, Q. I'm just repe	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you  On two occasions, not it was just the  Okay.  There was one occasion when Chris McKlarney and Charlie Herbert.  All right. I'm sorry, Charlie Herbert? ating that for the court reporter.  Yes.  MR. GUYNN: I don't have any other	5 6 7 8 9 10 11 12 13 14 15 16 17	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	
6 7 8 9 10 11 12 13 14 15 16 17 18	getting paid Q. his office, w and him? A. two of us. Q. A. was present, Q. I'm just repe	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you  On two occasions, not it was just the  Okay.  There was one occasion when Chris McKlarney and Charlie Herbert.  All right. I'm sorry, Charlie Herbert? ating that for the court reporter.  Yes.  MR. GUYNN: I don't have any other ions.	5 6 7 8 9 10 11 12 13 14 15 16 17	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	
6 7 8 9 10 11 12 13 14 15 16 17 18	getting paid Q. his office, w and him? A. two of us. Q. A. was present, Q. I'm just repe A. quest	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you  On two occasions, not it was just the  Okay.  There was one occasion when Chris McKlarney and Charlie Herbert.  All right. I'm sorry, Charlie Herbert? ating that for the court reporter.  Yes.  MR. GUYNN: I don't have any other ions.  MR. STRELKA: Neither do I. Thank you,	5 6 7 8 9 10 11 12 13 14 15 16 17 18	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	
6 7 8 9 10 11 12 13 14 15 16 17 18 19	getting paid Q. his office, w and him? A. two of us. Q. A. was present, Q. I'm just repe	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you  On two occasions, not it was just the  Okay.  There was one occasion when Chris McKlarney and Charlie Herbert.  All right. I'm sorry, Charlie Herbert? ating that for the court reporter.  Yes.  MR. GUYNN: I don't have any other ions.  MR. STRELKA: Neither do I. Thank you,	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	getting paid Q. his office, w and him? A. two of us. Q. A. was present, Q. I'm just repe A. quest	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you  On two occasions, not it was just the  Okay.  There was one occasion when Chris McKlarney and Charlie Herbert.  All right. I'm sorry, Charlie Herbert? ating that for the court reporter.  Yes.  MR. GUYNN: I don't have any other ions.  MR. STRELKA: Neither do I. Thank you,  .  MR. GUYNN: I guess since I have the speech	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	getting paid Q. his office, w and him? A. two of us. Q. A. was present, Q. I'm just repe A. quest ma'am down,	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you  On two occasions, not it was just the  Okay.  There was one occasion when Chris McKlarney and Charlie Herbert.  All right. I'm sorry, Charlie Herbert? ating that for the court reporter.  Yes.  MR. GUYNN: I don't have any other ions.  MR. STRELKA: Neither do I. Thank you,  .  MR. GUYNN: I guess since I have the speech we have to get your signature on the	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	getting paid Q. his office, w and him? A. two of us. Q. A. was present, Q. I'm just repe A. quest ma'am down,	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you  On two occasions, not it was just the  Okay.  There was one occasion when Chris McKlarney and Charlie Herbert.  All right. I'm sorry, Charlie Herbert? ating that for the court reporter.  Yes.  MR. GUYNN: I don't have any other ions.  MR. STREIKA: Neither do I. Thank you,  .  MR. GUYNN: I guess since I have the speech we have to get your signature on the cripts of your testimony	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	getting paid Q. his office, w and him? A. two of us. Q. A. was present, Q. I'm just repe A. quest ma'am down,	for work they are not doing.  Okay. And when you met with the Sheriff in as anybody else there in the office, just you  On two occasions, not it was just the  Okay.  There was one occasion when Chris McKlarney and Charlie Herbert.  All right. I'm sorry, Charlie Herbert? ating that for the court reporter.  Yes.  MR. GUYNN: I don't have any other ions.  MR. STRELKA: Neither do I. Thank you,  .  MR. GUYNN: I guess since I have the speech we have to get your signature on the	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. STRELKA: Yes, ma'am.  THE WITNESS: Yes.  MR. STRELKA: Will you do that?  THE WITNESS: Yes.  MR. STRELKA: You are free to go.	

## BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS Christine Link-Owens on 04/10/2015

Pages 82..83

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Page 82
                          WITNESS SIGNATURE WAIVER
 2
3
                    The signing of the deposition by the
            deponent was waived at the time of the taking of
 4
5
             the deposition.
 6
     GisaM. Hooher RPR
8
    LISA M. HOOKER, RPR #29505
11
13
17
18
19
20
21
22
23
24
                                                      Page 83
1
                   CERTIFICATE
    COMMONWEALTH OF VIRGINIA
    COUNTY OF ROANOKE
4
                   I, Lisa M. Hooker, Notary Public in and for
   the Commonwealth of Virginia, at Large, do hereby certify
  that the Deposition of CHRISTINE LINK-OWENS was by me
    reduced to machine shorthand in the presence of the
   witness, afterwards transcribed under my direction by
    means of Computer, and that to the best of my ability the
    foregoing is a true and correct transcript of the
11
   Deposition as aforesaid.
12
                   I further certify that this Deposition was
   taken at the time and place in the foregoing caption
14
    specified.
15
                   I further certify that I am not a relative,
   counsel or attorney for either party or otherwise
16
    interested in the outcome of this action.
17
18
                   IN WITNESS WHEREOF, I have hereunto set my
19
    hand at Roanoke, Virginia, on this the 24th day of
    April, 2015.
21
                                  Lisa M. Hooker RPR
22
                                     Notary Public
23
    My commission expires October 31, 2015.
24 Notary Registration Number: 165043
```

#### **BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS** Christine Link-Owens on 04/10/2015 Index: \$150. addressed

	Christine Link-O	wens on 04/10/2015	Index: \$150addresse
	21:12 49:6	<b>42</b> 16:20	31:15
\$	<b>2012</b> 8:13	17:1,4	34:12
<b>\$150</b> 23:3,8	13:10 60:8	<b>43</b> 31:16,20	46:23
24:8 26:24		32:17	49:20
27:10,18	<b>2013</b> 6:18,		51:22
67:23 69:6	21 7:23	44 34:13,22	54:16
	8:1 10:7,	35:1,24 72:14	59:14 63:2
<b>\$20</b> 23:11	21 11:7,9	/2•14	accept 66:17
25:24	21:15,22 22:1	<b>45</b> 46:24	access 8:1
26:10,24	32:11,23	47:5	12:20,22
	34:23	<b>46</b> 49:21	33:21
1	49:16	50:2	45:11,12
<b>1</b> 6:15	64:20	<b>47</b> 51:23	64:19
1 0.12		4/ 51.23	70:24 71:1
<b>11</b> 49:6	<b>2014</b> 64:24	<b>48</b> 54:17	70.24 /1.1
11th 74:9,	73:4	62:23	accountability
12,14	<b>2015</b> 6:15	<b>49</b> 59:15,23	28:24
		62:18,22	73:12
<b>12:45</b> 81:10	23 35:6,24		accurate
<b>1999</b> 5:22	36:2,5,6,	<b>4:27</b> 34:23	51:2
6:8 7:2	7,8,18,19		accusations
28:6 77:15		5	37:7 45:7
<b>1:30</b> 55:2	39:4,7	<b>50</b> 15:21	65:5 73:14
	<b>27</b> 32:22	19:15	03.3 /3.14
2	<b>2:00</b> 30:1	62:24 63:3	accused
	55:3	02.21 03.3	33:24 64:4
<b>20</b> 15:6,18	22.2		Act 55:15
18:15		6	61:14
30:12,17	3	<b>6</b> 17:22	active 6:16
<b>2000's</b> 78:3	<b>30</b> 9:13	18:6	7:22
	71:6 80:4		7 • 22
2003 78:4		6th 23:20	actual 34:1
<b>2008</b> 78:11	<b>31</b> 34:23		address 5:22
<b>2011</b> 10:16,		A	16:5,13
21,23	4	above-	17:11
11:11	41 21 • 01	mentioned	42:20
17:22 18:6	<b>41</b> 31:21	16:19	addressed
			auuressed

## BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS **Christine Link-Owens on 04/10/2015** Index: addressing..April

	Christine Link-Ov	vens on 04/10/2015	index: addressingApr
11:13	advertise	allegedly	70:18
addressing	68:14	38:1 53:16	72:18
38:17	advised	allowed 7:3	73:1,6,21
	72:18	9:17	75:1
administration	-	25:11,20	animals
64:22	advocates	27:18	7:12,16
admit 56:16	23:17	33:20 40:6	•
admitted	affairs	45:10 70:9	
36:7,8	29:21	72:19	
•	affiliated	73:2,6	19:19
adopt 7:12,	5:13	allowing	37:15
<del>-</del>	- 55 02:00	38:22	47:11,21
	afford 23:20	30.22	48:18,22
25:8,11		Altizer	49:8,10
27:18,23		78:13	51:3,5
53:10 /0:9	68:5 69:12	Amanda 52:12	53:15 70:7
adopted 6:2	afraid	amount 26:8	anonimoud
24:12,17	52:15,24	amount 20.0	43:11
25:6 26:23	aggressive	Angie 52:9,	43.11
27:12 68:6	46:4 52:20	11	answers 4:18
69:2,5	53:4	angry 44:20	anymore
70:7,22		45:17	33:22
71:11	aggressively		
adopting	52:15		
22:11 23:3	<b>agree</b> 14:12	17 6:3	18:11
72:4	15:2 67:22	8:22,23	appears
	<b>agreed</b> 37:18	9:16 13:21	39:16
adoption	_	14:7 19:3	approached
6:2,5 22:9	Agriculture	24:7 25:6	47:24
23:12	41:3,7	32:22 37:4	52:17
25:24	43:5 47:14		
26:24	49:10	42:5	approaches
27:16	55:17	43:14,16,	53:2
52:20	56:12	24 44:8,18	Approximately
71:14	61:15,22	45:12,14	78:3
adoptions	66:1	48:20 49:5	April 23:20
7:9 26:2	ahead 62:5	51:17 60:2	28:1,3
			Z: (1 A   1 3
70:3		68:17,18	20 1 1 7 3

## BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS **Christine Link-Owens on 04/10/2015** Index: area..boys

	Christine Link-O	wens on 04/10/2015	Index: areaboys
76:24	attempt	24:15	<b>belief</b> 71:19
area 12:19	74:23	26:20 27:8	72:9
19:21,23	attempted	31:21 35:7	<b>big</b> 56:5
,	16:13	37:15,20	_
<b>arose</b> 9:18		39:2 43:7	bin 70:24
arrive 16:2	attempts	44:22,23	<b>black</b> 55:24
30:1,4	37:5	45:18	<b>blame</b> 56:11
arrived 30:8	attended	53:20	
50:14 55:4	20:4	60:20	Board 17:18,
	attention	62:22	19,24 37:4
assess 52:19	22:9 38:21	65:20	75:2,4,10,
assistance	39:15	73:7,17	23 78:18
23:19	40:19	74:3 76:8	boarded 15:7
27:13	51:15	78:1	bodies 18:18
68:15,19	a	<b>bad</b> 50:21	
assisted	attorney 18:8	basically	body 39:16
69:19		8:7 33:24	46:2,4
aggigting	authenticate	37:11	<b>book</b> 26:6
assisting 64:18	35:22	43:7,22	books 26:17
	authorization	44:20	
assume 33:2	24:20	47:19,24	bottom 24:3, 6 32:21
assumed 73:5	authorize	·	
assuming	24:8 80:7	basis 70:20	36:18 39:8
46:9		71:21 72:1,6	80:15
	average 64:1	·	
assumption	<b>avoid</b> 7:18	bedding 21:5	
44:4	aware 9:23	began 13:10	15:16,17,
<b>astray</b> 45:13	27:11	_	23 16:3
attached	64:13 65:2	beginning 10:21	30:20 31:9
48:8	76:6		bowls 30:14,
		begins 35:11	16,18
Attachments	awareness	39:8	31:4,5,10
48:5	5:24	behavior	box 8:24
attack 15:14		52:23,24	9:3,8
52:16 53:2	В	53:4,7	
attacking	<b>back</b> 6:15	Belcher	boys 53:16
16:4	9:8 22:1	78:20	54:9
10 1	J•O ZZ•I	/ U • 4 U	

#### BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS Christine Link-Owens on 04/10/2015 **Index:** bragging..cleaning

bragging	45.0.2.5		
	45:2,3,5,	caveat 19:22	52:18
52:19	8,10	certificate	children
bring 11:19	cage 52:17	24:19,22	54:4,7,12
36:9,11	53:1,2,3	68:5 69:8	
42:8	<b>caked</b> 50:22	certificates	<pre>chisel 30:23 choose 81:3</pre>
bringing	call 20:24	68:9	
11:10	67:21 71:2	chance 33:18	Chris 29:4
38:20			32.22
<b>broom</b> 51:16	called 11:4	_	33:14
52:16 53:8	46:14	80:6,7	78:20
52.10 53.8	50:11	changed 44:6	79:12
brought	67:16	52:10	Christine
10:20	cameras		4:1 5:8
11:23 22:9	28:20	changing	33:2
24:23	29:12,16	30:14	
40:18	·	characterizati	
42:21 45:6	card 41:20	on 14:14	35:14,17
53:16	42:7,11	Charlie	36:23 37:2
	care 15:7,		<b>citing</b> 18:12
brush 30:24	19,21	33:15 44:7	_
buckets 31:5	19:14,19,	79:13,14	citizen
buildup	24 21:3	chasing 34:7	43:15
30:19,20	47:11,21	Chagtity	<b>claim</b> 7:21
31:3	63:11 65:5		-1 ! 6 ! - 1
31.3	69:17	25:14,17,	clarified
<b>built</b> 77:19	09.17	•	14:24
bunch 56:9,	careful	19 28:17	clarify
12	38:21	30:7 38:13 48:20	48:1,3
business	case 48:24	52:13 53:6	clean 30:3,
20:23	49:2,3,4,6	54:4,6	12 31:8
	71:2	55:2 67:7	
41:20		70:19	cleaned 15:6
42:7,11	cases 63:10	78:24	21:4 30:17
bypass 9:4	cash 26:10		31:6 50:23
	cat 45:9	check 8:10	cleaning
С		9:4 33:23	30:18,24
	cats 13:2,3	53:21	31:9,10
cabinet	19:15		

#### BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS Christine Link-Owens on 04/10/2015 Index: clear..correct

	Christine Link-O	wens on 04/10/2015	Index: clearcorrec
<b>clear</b> 25:9	22:4	17:14	control 8:23
43:17	community	29:20	9:17 13:21
62:14	6:1 23:19	41:12,19,	14:7 24:7
7		21 42:22	31:11
clinic 20:11	68:13,14	77:19 79:4	41:11,16
clinics	77:19		42:5 44:8,
19:11	compiling	concluded	18 45:14
<b>clip</b> 58:13	43:8	81:10	64:14
59:12	aammlaint	condition	70:18
39.12	<b>complaint</b> 38:12 41:6	51:10	70.10
clock 28:20	30.12 41.0	71. 1	controller
<b>clue</b> 63:23	complaints	conditions	78:24
	9:18,23	6:5 50:13	conversation
coat 50:22	complete	conducted	41:16,18
coated 50:21	24:6 64:23	29:21	67:2 68:24
code 9:2		confused	
	completed	35:19	conversations
18:13	77:24		64:10
collect	completely	70:11	coordinator
22:10	4:23 53:5	constantly	6:16 28:8
collecting		45:4	77:1
67:13	completion	consult 18:8	
07.13	77:23	COMBUIC 10.0	copies 12:9,
collectively	compliant	contact	11,15,18
59:11,24	5 <b>:</b> 23	42:24	56:19
color 55:24		64:22	59:18
33 21	complicated	68:8,12,14	<b>copy</b> 9:5
comment	40:10	74:19 75:9	11:18,21
75:20	concept	76:1,5	12:4 36:6
78:18	69:24	contained	46:18
comments	gongern	50:8	61:11
40:5 75:22	concern 42:17		62:19
78:17		continually	80:9,20
	48:16	11:10	
common 72:9,	77:15	continue	correct 8:2
10	concerned	69:15	25:7 40:24
commonplace	43:15		66:13
13:13	60:13	continued	67:18,24
	concorns	11:12	69:4
communicating	concerns	52:14	

#### **BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS** Christine Link-Owens on 04/10/2015 Index: correctly\_disagree

	Christine Link-O	wens on 04/10/2015	Index: correctlydisagree
correctly	48:21	decided	31:16,17
37:8 66:4	culled 55:19	37:10 74:3	34:13,14
69:1 72:13		decision	36:11
77:16	curious	7:21	46:24 47:1
County 5:14,	69:23	37:16,17,	49:21,22
23 6:4 7:3	custody 60:2		51:23,24
17:12,16		-	54:17,18
18:23 19:1		delivered	59:15,16
22:22		10:17,22	63:3,4
23:1,8	daddy 53:9	demand $71:9$	80:10
28:21	Dalmatian	denied 50:7	81:10
32:21	61:1		describe
37:5,13	Daltam 1/1.E	department	20:19
38:9,21		8:11 41:3,	35:17
40:19	33:14	6 43:4,19,	60:21
64:22	45:19	23 47:14	describes
65:16,18,		49:10 55:13,16	48:20
20 67:9	<b>date</b> 66:9	56:8,11	
69:11 73:5	74:12	59:5	describing
74:19 75:1	<b>dated</b> 34:22	61:15,22	48:19
78:20	dates 49:4	66:1	63:18
couple 36:20	73:16		desk 70:24
55:17		deposed 4:11	details 13:6
76:15,20	day 8:8	deposit	17:20
1.01	13:11,13	22:10	25:10 30:6
court 4:21	14:10	23:4,9	
55:23 79:15	15:1,19,	24:8	determined
80:1,8	23,24 16:3 21:5 24:16	26:12,20	42:13
00.1,0	30:5 31:3,	27:1,19	
covered	7 26.0	67:14,23	28:19
15:10 51:5	43:2	70:4,10	<b>die</b> 69:16
53:15	50:10,15,	71:12,16	
crates 30:7	20 52:12	72:5	digital 48:8
created 27:9		deposition	dirty 30:14
		4:11 12:14	disagree
cried 37:16	_	14:8	14:12 15:2
Crystal	71:6 80:4	16:20,21	69:9

## BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS Christine Link-Owens on 04/10/2015 Index: disappear..employees

	Christine Link-O	wens on 04/10/2015 Inc	dex: disappearemployees
disappear	46:23	dogs 15:21	<b>edge</b> 30:20
45:4	49:20	19:15 21:3	education
disappeared	50:16	27:23	19:20,22,
45:6	51:22	30:8,10	23
43.0	54:16 63:2	50:20	43
disappearing	66:2	52:24	elected
13:19		57:11 61:5	49:12 51:4
45:8,9	documentation	69:1,16,20	email 22:4,
disappears	11:15	71:9	17 32:21
15:17	28:23		33:2,4
	32:10	donation	34:4,22
discuss 10:2	42:18,19,	45:16	
75:13 76:2	20,22	drafted 18:9	35:1,3,11,
discussed	48:16		15,23
33:16 34:2	60:14,15	dreaded 5:4	36:2,18,20
	63:14	<b>dries</b> 30:22	39:8,11,
discussion	66:6,22	drink 15:15	17,22 43:3
28:10,18	67:3 74:2	31:2	47:7,9,15,
41:11	documents	31.2	19,23 48:4
discussions	55:18	drive 9:14,	49:2 50:2
17:24 76:7	22.10	15	52:3 54:22
	<b>dog</b> 15:10	Duncan 79:3	62:11
disease	16:2 21:9		63:7,9,18
31:10	24:17,23	Dunn 4:10	emails 22:2,
dispatch	25:6,8,12,	76:2,5	7 32:20
8:11,16	19,20	duplicates	47:23
9:14 33:23	26:23	56:10,12,	55:18
	27:12	16	57:10 66:1
Dixie 48:20	30:19 45:9		72:14,17,
document	52:14,17	duties 7:10	24 73:17
11:22	53:3,6,11		
16:19	58:17,19,	E	74:24
23:21,24	22 60:3,		employed
24:10	18,22	earlier 4:9	5:10
25:22	67:17	12:5 24:10	employee
31:15	68:6,24	34:5 65:11	28:15 55:4
32:20	69:5,7	<b>early</b> 30:5	79:3
34:12	70:5,22	<b>easy</b> 4:13	
35:12 39:4	71:3	caby 1.10	employees
	, 5		38:22

#### BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS Christine Link-Owens on 04/10/2015 **Index: enacted..fees**

	Cili istine Link-O	wens on 04/10/2015	Index: enactedfee
70:14	euthanize	54:14,17	15:20
enacted	7:21	56:17,19	18:17,24
64:19	euthanized	57:8 58:7,	41:12
	69:3,8,15	11 59:11,	<b>fact</b> 46:3
encountered	• •	15,23	66:14
27:14	euthanizing	60:20	
encouraged	69:19	62:15,16	facts 67:4
28:21	events 46:7	63:3 67:13	fair 78:7
42:23	eventually	72:13	false 65:5
encouraging	46:11	Exhibits	73:13
6:2,3		39:5	
•	exact 8:20		familiar
engage 33:5	17:20	experience	34:6
enter 12:6	20:24	18:19	<b>family</b> 24:15
16:17	EXAMINATION	19:5,9,21,	68:2 69:6
entered	4:6 65:10	22 65:5 80:16	70:8,9
16:20	exception	80.10	February
31:16	14:11	extends	10:11,16,
34:13		35:12	23 11:9
46:24	excuse 39:7	36:20 39:9	17:22 18:6
49:21	exhibit 12:7	<b>extra</b> 9:13	22:3
51:23	16:17,20,	55:18	
54:17	24 17:3	56:19	feces 15:5,
59:15 63:3	27:3	FF·1	10,12
	31:13,16,	<b>eye</b> 55:1	50:22
entire 15:16	20,21		51:1,5
46:2 75:23	32:17	<b>F</b>	53:15
environment	34:5,13,21	<b>face</b> 67:8	<b>fee</b> 23:12
16:1	35:1,6,23,		25:24
errata 80:4,	24 36:2,	Facebook	<b>feed</b> 12:23
6	11,18,19	38:10,14	13:11
4.6	39:4,7	40:15	30:3,11
<b>ESQ</b> 4:6	46:20,24	facilitate	45:13
65:10	47:5	6:22	
estate 8:24	49:18,21	facilities	feel 16:9
	50:2	7:17 15:5	69:20
euthanasia	F1 • OO OO	, - 1 1 1 3 • 3	5 07.16
euthanasia 7:18	51:20,23	facility	<b>fees</b> 27:16

## BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS **Christine Link-Owens on 04/10/2015 Index: felt..group**

	Christine Link-O	wells off 04/10/2015	Index: feltgroup
felt 28:15,	24 13:2,3,	68:16	69:10
22 29:16	8,16,17,	70:4,8	72:18
37:6,14	18,19 15:8	71:17,22	73:1,6,21
40:21	31:5 45:9,	72:4	give 8:3
47:10	12,14,16	frightful	13:16 48:2
65:18 70:7	69:17	46:5	49:4 56:5
73:13	73:20		58:4 73:16
female 60:3	foot 45:9	front 11:15 17:1	giving 55:14
68:3,6	form 24:1,	<b>full</b> 5:7	glass 31:2
<b>figure</b> 72:23	5,11		_
file 42:22	<b>formed</b> 77:15	funny 52:15	glorified 21:1
48:7	forms 61:3	G	good 4:7,8
fill 15:16	found 10:2		48:17
26:5,7	38:2 45:13	G.A.R. 64:18	: EE:10
80:5	46:11,12	74:20	gooing 55:10
filled 15:24	foundation	gate 9:1	<b>Gough</b> 45:21
16:4	76:9	33:22	governing
film 30:21,		<b>gave</b> 18:3	18:18
22	founded 5:22	24:19,22	~~~~~~
	28:6	26:19 36:6	governs 18:16
finances	<b>frame</b> 10:5	41:20	10.10
68:3	13:9 61:8	56:20	great 9:16,
financial	Frank 45:20,	-1 1-	22 19:21
29:13	21	67:12 68:5	Greenbrier
   <b>find</b> 8:6			78:23
15:3	free 8:7	GCAR 20:11	
	24:19 81:8	29:6 38:3 48:12 56:2	
fine 36:14	Freedom	64:18	group 17:7,
80:19	55:15		14 23:17
flip 71:3	61:14	Giles 5:14,	
focus 28:14	friend 54:5	17 6:23	40:21
39:15			43:14,16,
	friendly	23:1 32:21	
	44:16	37:4 38:9,	
70:4	friends		68:20 70:3
food 12:23,	27:23	65:16,17	75:16

#### BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS Christine Link-Owens on 04/10/2015 Index: guard..identify

Christine Link-Owens on 04/10/2015			Index: guardidentify
76:5,23	19:5,6,9	helping	Hooker 4:3
78:15 guard 53:1	handwriting 31:24 32:1	40:22 65:17	hose 15:14, 15
guess 26:18 36:10 79:21 guns 46:4	handwritten 31:22 hang 8:24 34:1	helps 67:3  Helsel 41:2  43:7 44:10  46:15	hosing 31:8 hospital 19:13 20:15,18
Guynn 12:8, 13 14:13, 16,19,24	hanging 33:21	Herbert 29:8 44:7 79:13,14	hour 9:12 64:1 hours 7:4,8,
27:6 34:6, 10 35:19 36:1,4,9,	happened 24:15 38:7 40:18	higher 7:13	11 15:8 63:22
14 55:21 56:9,13, 18,22 57:4	43:18,22 44:17 46:7,10	21:12 highly 71:9 hired 67:9	housed 19:15 21:9 49:11 huh-huh 5:4
62:14,21 65:10	50:19 53:23 54:1 67:2 71:5	hit 56:21	Humane 18:23
79:17,21 80:1,13,20 81:1	happening 8:3 23:14 71:20	31:23 39:14,18 61:6	69:15 hurt 44:21
н	happy 62:10	hmm-hmm's 5:5	I
hair 50:22 half 35:2	hard 15:3 head 15:11 39:1 42:10	hold 7:11 17:2 19:7	idea 44:9 46:8
36:18 39:17 hand 10:17,	heading 48:4	holidays 14:11,17	<pre>identification 53:13 54:13</pre>
22 46:3 55:9	heard 51:9 68:18	home 4:15 42:7 62:8 69:12	identified 39:7 49:9
handed 35:24 59:23	helper 21:1 67:9	honest 41:10 78:6	57:11 59:11 61:21
handle 52:16 hands-on	helpful 9:9 66:24	honestly 46:10 78:9	identify

#### BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS Christine Link-Owens on 04/10/2015 Index: identifying..kill

	Christine Link-O	wens on 04/10/2015	Index: identifyingk
32:14	individuals	investigator	61:12
35:22 56:7	53:14	41:3 47:13	65:8,10
57:6 62:18	information	56:3 57:24 58:1 64:11	<b>job</b> 28:15
identifying	17:19 18:4		52:19 79:4
49:9 impossible 37:22	19:3 24:11 42:14,15 44:12	<pre>involved 7:13 18:24 19:16</pre>	jobs 20:22, 24
<pre>improve 6:5 inappropriate 38:3 46:1</pre>	46:15 47:18,20 48:2 55:15 61:14 75:3	<pre>irate 44:8,   18 45:23 irony 45:4</pre>	Jones 14:10 15:1 24:10 50:6 51:16 53:16
inappropriatel y 51:16	informed 17:16	irresponsible 71:24	54:11 JR 65:10
77:12	64:21	issuance	June 60:8
incidence	initial	35:15	justify
60:12	11:11	<b>issue</b> 13:16	50:21
<pre>incidences 50:7</pre>	injured 60:4	27:15 31:11	K
incident 8:23 51:14	inspection 46:13,17 install	issues 5:23 6:3 8:14 11:17,23	kennel 15:7 21:1 67:9
incidents 48:21,22	29:15 instance	16:6,13 17:6,8	<b>kennels</b> 15:6,22
<pre>included 27:5</pre>	8:16 20:20 29:23 68:9	21:11,14, 21 28:13	21:4 30:12 50:23
includes 55:17	Institute 5:12	34:2 38:1 52:20 76:2	<pre>Kevin 78:20 key 8:9,10,</pre>
incorporated 6:11	intake 61:8 71:6	items 17:11 44:1 73:20	15,17,20, 21 9:3,4, 5,6 12:22
indicating 57:22	<pre>interests 37:10</pre>		33:21,23 45:5
58:3,21	Internet	January 6:15 11:7 32:22	keys 8:9
individual	38:2	34:23	kill 7:18
75:10 76:1,5	introduce	Jim 55:9	18:24

#### BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS Christine Link-Owens on 04/10/2015 Index: kind..Marie

	Christine Link-Ov	wens on 04/10/2015	Index: kindMar
30:11	learned 19:2	lock 8:24	lying 64:5
kind 33:18	21:7	9:3,8	
48:19	leave 44:21,	locked 13:4,	M
61:15 66:6	22 45:18	8,17,18	
knew 13:12	leaving 55:3	45:1,3,5,8	made 9:11 17:14 21:4
22:17	_	long 9:15	23:13 27:4
25:10 32:8	left 9:9	28:9 30:24	
41:14	30:13 73:21	35:10 36:2	52 - 7 11 - 5
43:13 44:2		41:10,18	75:22
68:16	legal 5:7	50:23	
knowing	letter	52:22 78:9	mail 24:6
68:19	10:17,23,	long-term	make 7:20
00.17	24 11:11,	28:4	12:9,11
	15,21		15:23
	16:17	longer 37:12	
lab 21:1	17:5,15,	40:20,22	
label 57:4	17,21	64:14	29:2,5
	18:5,9	72:19 73:1 74:1	32 - 13
labeled 47:5	21 12 3, 3		40:9,12
laboratory	43:23	looked 13:15	
20:24	letters 22:2	24:10	58:7,11
lack 41:5	letting	61:11	62:19 67:5,23
69:17	53:10 70:7	lose 4:14	72:16
		lost 71:3	73:18
language	licensed		74:23
46:3,5	20:2	lot 15:6	80:22
large 15:17	<b>lights</b> 21:16	18:21,22	
30:9	limited	19:1,2,5,9	making 37:22 38:12 68:9
laws 18:16,	12:20	17,20	38:12 68:9 71:24 72:5
18 19:17	64:19	44:21	11.24 12.5
22:23	Link-owens	52:23	manager
lay 15:11	4:1 5:8,9	80:14	41:17
-	•		78:22
laying 51:1		lovely 4:21	manner 44:16
	live 65:17		Marie 5:8
15	loaned 8:16	3,11 77:1	

## BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS **Christine Link-Owens on 04/10/2015 Index:** mark..notice

	Christine Link-O	wens on 04/10/2015	Index: marknotice
mark 31:12	77:1	61:3	needed 8:19,
51:19	meetings	minutes 9:13	21 13:12
54:14	10:11 14:1		37:20
58:14	75:3,11,		43:24
marked 16:19		missing	44:14,21
31:15	76:15,21	58:15,16	45:13
	77:2 78:19	62:3	50:24
35:6 46:23		misunderstood	52:11,20
49:18,20	Melvin 14:5	70:13	66:2,22
51:22	33:14	mix 52:18	neuter 6:3
54:16	member 43:16	mix 52.16 61:1	24:17,19
59:15 63:2			25.13 27.1
	members 28:11	moment 36:17	68:15,19
married 14:9		47:4 50:1	69:12
matters 37:6	37:5,17 48:12 56:2	money 67:17	
	62:1 63:20	<del>-</del>	71:12
_	64:4 75:4,	Montgomery	
33:14	10	18:23 19:1	neutered
78:20	-	65:13,20	23:3,7
79:12	memory 40:1	morning $4:7$ ,	24:4,13,
	mentioned	8 56:21	18,23,24
meant 56:14,	65:11,12	move 21:24	25:6 68:4
18 77:5	·		neutering
media 38:5	messages 38:23	moved 35:21	23:18
	30.43	65:18	<b>newer</b> 77:19
medicine	<b>met</b> 76:19	multiple	
18:15,20	77:8 79:6	10:21	newly 68:6
19:24 52:21	mid 78:3	53:23,24	night 8:8
24.77		54:1	_
meet 78:13	middle 54:24		non-elected 78:19
meeting	Millirons	N	
10:1,14	49:11 51:4		notary 80:8
11:2 29:3,	76:10 78:8	names 48:7	<b>note</b> 67:6
8 32:9	mind 12:6	Nance 24:15	<b>noted</b> 53:15
33:6,7,9,	14:15 34:8	25:3,4,7	
11,16,19	38:8	necessarily	notes 31:22
45:7 75:15	min 11.16		notice 48:4
76:9,12	minute 11:16	11.13	

#### BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS Christine Link-Owens on 04/10/2015 **Index:** noticing..passionate

noticing         observed         76:16 79:7         28:5           71:8         30:13         officer 8:24         outlined           number 16:20         40:18         9:17 13:21         12:21           17:1,4         66:9,10         14:7 24:7         58:17,19           31:16,20,         41:11,17         outlining           21 32:17         obvious         42:5 44:8,         10:17           34:13,22         30:16 31:8         18 45:14         overpopulat           35:1,6,23,         37:12         officers         6:1 69:1           24 36:2,         44:17         70:18         15,17           18,19         occasion         officials         owner 71:2           42:18         79:12         older 77:7         p           46:24 47:5         occasions         79:9         one-page           7,21 50:2         79:9         p.m. 34:2	ion 4,
number       16:20       40:18       9:17       13:21       12:21         17:1,4       66:9,10       14:7       24:7       58:17,19         31:16,20,       41:11,17       outlining         21       32:17       obvious       42:5       44:8,       10:17         34:13,22       30:16       31:8       18       45:14       overpopulat         35:1,6,23,       37:12       officers       6:1       69:1         18,19       occasion       70:18       15,17         39:4,7       76:24       78:19       owner       71:2         46:24       47:5       64:24       77:7       p         49:3,5,6,       occasions       one-page       p       34:2         000000000000000000000000000000000000	ion 4,
number 16:20       40:18       9:17 13:21       12:21         17:1,4       66:9,10       14:7 24:7       58:17,19         31:16,20,       41:11,17       outlining         21 32:17       obvious       42:5 44:8,       10:17         34:13,22       30:16 31:8       18 45:14       overpopulat         35:1,6,23,       37:12       officers       6:1 69:1         24 36:2,       44:17       70:18       15,17         18,19       occasion       officials       owner 71:2         42:18       79:12       older 77:7       p         46:24 47:5       occasions       one-page         7 21 50:2       79:9       one-page	ion 4,
17:1,4 66:9,10 14:7 24:7 58:17,19 31:16,20, 72:2 41:11,17 outlining 21 32:17 obvious 42:5 44:8, 34:13,22 30:16 31:8 18 45:14 35:1,6,23, 37:12 officers 24 36:2, 44:17 70:18 6:1 69:1 18,19 occasion officials 70:18 76:24 78:19 42:18 79:12 older 77:7 p 49:3,5,6, 79:9 one-page 79:34:2	ion 4,
31:16,20, 72:2 41:11,17 outlining 21 32:17 obvious 42:5 44:8, 34:13,22 30:16 31:8 18 45:14 35:1,6,23, 37:12 officers 24 36:2, 44:17 70:18 6:1 69:1 18,19 occasion 39:4,7 76:24 78:19 46:24 47:5 49:3,5,6, 72:1 50:2 79:9 one-page  72:2 41:11,17 outlining 42:5 44:8, 10:17  overpopulat 6:1 69:1 15,17  owner 71:2  p  dider 77:7 p	ion 4,
21 32:17 obvious 42:5 44:8, 34:13,22 30:16 31:8 18 45:14 35:1,6,23, 37:12 officers 24 36:2, 44:17 70:18 6:1 69:1 18,19 occasion officials 39:4,7 76:24 78:19 42:18 79:12 older 77:7 p 49:3,5,6, 72:1 50:2 79:9 one-page	4,
34:13,22 30:16 31:8 18 45:14 35:1,6,23, 37:12 officers 24 36:2, 44:17 70:18 6:1 69:1 18,19 occasion officials 39:4,7 76:24 78:19 46:24 47:5 occasions 49:3,5,6, 721 50:2 79:9 one-page	4,
35:1,6,23, 37:12 officers 6:1 69:1 18,19 occasion 39:4,7 76:24 78:19 46:24 47:5 49:3,5,6, 721 50:2 79:9 officers 70:18  37:12 officers 6:1 69:1 15,17  officials 70:18  6:1 69:1 15,17  owner 71:2  p older 77:7 p  n m 34:2	4,
24 36:2, 44:17 70:18 6:1 69:1 18,19 occasion 39:4,7 76:24 78:19 46:24 47:5 occasions 49:3,5,6, 721 50:2 79:9 one-page  6:1 69:1 15,17 owner 71:2	
18,19 39:4,7 42:18 46:24 47:5 49:3,5,6, 7 21 50:2  15,17  occasion officials 78:19 older 77:7 p one-page  n.m. 34:2	2
39:4,7 76:24 78:19 42:18 79:12 older 77:7 p 49:3,5,6, occasions 7 21 50:2 79:9 one-page	2
42:18 79:12 78:19 46:24 47:5 older 77:7 p 49:3,5,6, occasions one-page one-page	
46:24 47:5 older 77:7 p 49:3,5,6, occasions one-page pm 34:2	
49:3,5,6, occasions ————————————————————————————————————	
7 21 50:2 79:9 one-page	
	3
51:23 occur 7:9 35:20 81:10	
54:17 55:6,7 <b>open</b> 7:4,8,	2
59:15,23, 11 9:3 pack 01:1	
24 61:9 occurred 14:20 pages 36:2	20
$62:24 \ 63:3$ $22.9 \ 23.13$ operational paid 79:5	
72:14 48:23 73:5 paper 40:1	1 /1
numbers 17 58:13	
0ccurring 75.10 50.12	
51:10	
offer 29:2,5 order 54:13 paperwork	
O 45:14 Ordinance 24:23	
Oath 72:1 offered 22:24 64:23	
70:23	_
object 14:13 28:22 ordinances 71:1,2,1 29:15 23:1,2	5
objection paragraph	
27:5 offering organization 48:19	
observation 29:7 5:14,20 50:4,6,8	
31:4 <b>office</b> 8:11 6:13,22 55:1	
20:7,23 7:3 62:1	
24:5 29:22 63:21 64:4	
63:19,20 21:3 23:23 77:15 29:16	
observe 54:8 64:22 original 69:21	

#### BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS Christine Link-Owens on 04/10/2015 Index: past..present

	wens on 04/10/2015	Index: pastpresent	
past 6:14	persisted	photocopy	69:20
49:13	21:21	24:1 32:8	<b>places</b> 20:21
pause 9:20	person 4:22	60:16	
	8:17 9:6	photograph	pleading
paw 60:4	17:13,17	60:1,2,18	33:5
pay 23:3,11	22:11	61:11	point 7:24
25:24	23:3,11		14:24 28:8
28:22	26:19,23	photographs	41:5 42:12
29:15	41:17	48:8,9,11, 13 58:1,6	policy
55:23	43:12,15	13 58:1,6 59:14,24	22:20,21
paying 70:3	45:12	59:14,24 63:17	
	46:12 48:2		<b>pooper</b> 15:23
<pre>people 7:14 9:5,15</pre>	67:10,20	physically	portion
13:7,11	78:23	29:2,18	24:3,6
•	personal 9:5	60:10	position
25:24		pick 17:3	65:6
27:11,17	personally	62:17	post 38:22
40:14	13:23 50:8	picture	
41:22	67:11 68:21	58:15,16	posted
44:21	68:21 69:19	59:24	38:19,24
52:16,22		60:9,10,	posting 38:1
54:8 70:2,	pet 7:15	11,20,22	posts 38:13,
6 80:16	15:19	pictures	18
period 7:20	23:2,6	48:8	
70:19 73:8	24:2,4,12	50:16,20,	pound 7:19
	52:23	21 55:11,	19:1 77:16
periodically	69:12,14	20 56:1,2,	<b>pounds</b> 52:18
11:12	pets 6:2	6,7 57:1,	practice
Perkins	7:19 15:7	9,12 59:2,	72:10
14:4,9	49:13	10 61:21,	
16:6 29:18	52:19	24 62:10	practices 20:12
30:2 38:1	65:18	66:10,11	
50:7 51:15	Phd 52:23	·	prepare 80:2
53:15	phone 67:20	pile 35:7,8	prepares
63:22	_	<b>piles</b> 15:12	80:2
persist	photocopies	<b>place</b> 15:11	present
21:14	61:7	16:9 34:1	29:18 62:2

## BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS **Christine Link-Owens on 04/10/2015 Index: president..rates**

	Christine Link-Owens on 04/10/2015			
73:10	12:20	properly	purebred	
79:13	17:10,23	21:4	71:9	
president	18:3 30:2	30:18,24	purposely	
6:12,18	49:16	31:1,6	26:16	
11:22 12:2	61:17	41:15	20110	
17:8,10,	64:19	protecting	purposes	
11,23 18:3	65:24 68:8	53:4	54:14	
28:7 29:8	78:12	-	<b>put</b> 9:8	
68:16,19	private	protocols	17:6 18:16	
74:20	20:12	18:16	29:13 35:7	
76:19,24		19:17	38:8 40:14	
·	problem 9:19	<b>prove</b> 72:10	62:22 65:6	
press 40:10,	45:3	provide 4:18	76:8	
12	69:14,16	5:21 23:7,	putting	
<pre>pretty 73:24</pre>	problems	19 47:17	28:19 53:9	
prevented	10:2,18,20	48:17	_0 _7 00 7	
8:1	11:11,12	62:15	Q	
	process 9:11	68:18		
previous	19:17 26:2		question 5:3	
17:9 39:3		provided	13:24 61:2	
53:13	profession	46:17 49:2	72:21	
74:20	15:19	60:14	questioning	
previously	Professional	61:19	12:19	
5:14 35:6	4:2	63:12	12.19	
39:6 65:4	program	provoke	questions	
primarily	24:21	52:14	4:17 65:8	
5:22 6:4		<pre>public 7:5,</pre>	79:18	
13:2 19:12	promise	9,11 30:4	quick 12:19	
22:4	25:14	75:17,19	58:7	
:	<pre>proof 23:7</pre>	78:18 80:8		
primary 7:10	27:20	11 7·1 <i>6</i>		
28:14	71:20	<b>pull</b> 7:16 8:22		
<b>print</b> 56:21	proper 21:5	8:22 37:11,15,	raise 5:24	
printout	22:20	20 53:3,6	rarely 13:4	
55:15	25:10	56:15 74:3	<del>-</del>	
	31:10		rate 7:13	
prior 8:3	63:11	<pre>pulled 30:10</pre>	rates 6:6	
11:22		53:8		

## BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS **Christine Link-Owens on 04/10/2015** Index: reach..rescue

	Christine Link-O	wens on 04/10/2015	Index: reachrescue
reach 43:19	26:5,24	refresh 40:1	reported
read 39:19	27:4,9	refund 22:21	55:3 63:20
50:6 80:4,	receive	23:8	reporter
21	19:20,23	refused	4:2,22
reading	received	45:15 53:7	46:14,17
72:12	22:17	43.13 33.7	79:15
	43:23	refusing	80:1,8
ready 30:3	44:11	37:19 40:5	represent
real 8:24		45:16	4:10 32:19
12:19 58:6	reclaim	Registered	64:7
realized	7:12,13,15	4:2	
46:16	reclaims	regulation	reproduce
65:16	7:13	69:11	69:13
	recognized		request
reason 45:10	67:8	regulations	10:14
71:1		5:24	47:14
reasons	record	reign 8:7	55:16
29:13	34:16,18	relay 17:13	61:14
69:10	36:15	_	requested
recall 10:4	60:3,21	remedy 28:12	73:10
33:6 34:22	records	remember	requesting
35:2,10,14	24:14 39:2	8:20 11:17	10:10
38:12,23	43:8 49:4	22:8 32:7	
39:11,22	53:20	36:23	required
42:9 45:24	60:16	38:7,17,	26:7
47:7,15	71:3,5	19,20	requirements
51:14 52:5	78:2	46:11 52:9	21:8
54:21,24	<b>refer</b> 57:10	67:4 72:20	rescue 5:15,
63:7 72:14	referring	74:11 78:4	18 6:16
77:14	61:12	repairs 8:19	19:4 28:8
receipt	67:11	repeating	32:22 37:4
25 <b>:</b> 23	refilling	79:15	43:14,16,
26:6,8,13,	31:9	monless	24 53:11
17 27:10		replace 28:14	68:17,18
71:11,15	reflect		72:18
receipts	61:13	report 46:18	73:1,6,21
		58:17,20	

#### **BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS** Christine Link-Owens on 04/10/2015 Index: rescued\_shelter

rescued         review         36:17         send         7:17         55:18 75:3           30:10 69:2         room 12:24         17:17         shebang           rescues         7:17         13:1,3,4,         47:9,15         61:16           research         8,18         58:5 60:14         sheet         80:4,6           18:12 21:3         rules         4:21         61:14,22         shelter           residue         31:5         rumor         70:20         63:9 73:11         5:23,24           resolved         15:5 41:15         74:4 80:3,         6:1,5,22         7:4 8:1,5,22           resolved         15:5 41:15         rumning         34:22         7:4 8:1,5,22           22:14         41:23         sending         22:2         19:29 9:8,           5:3 10:24         5         sad         58:24         56:12         15:0:3           responded         22:13         saliva         30:19         54:21         15:4           response         saliva         30:19         sense         8:4         27:15           responsibility         30:11         26:13,17,         29:13,22,         29:13,22,           restriced         42:8         sat 17:7,14		Christine Link-O	wens on 04/10/2015	<b>Index: rescuedshelter</b>
rescues 7:17 13:1,3,4, 8:18 research 18:12 21:3 rules 4:21 61:14,22 sheet 80:4,6  18:12 21:3 rules 4:21 61:14,22 sheet 80:4,6  residue 31:5 rumor 70:20 63:9 73:11 5:23,24  resolved 7:4 81:15  21:17,20 running 22:14 41:23 34:22 15:10:3  responded 4:23 5:3 10:24 54:21 55:3,10 32:21,22,  responded 22:6,13 sad 58:24 56:12 63:7 18:17,22  responded 22:13 salim 42:2,3 56:24 19:16 21:8  response saliva 30:19 22:14 56:12 63:7 18:17,22  response saliva 30:19 73:5 sanctuary 25:3 sense 8:4 27:15  responsibility 73:5 sat 17:7,14 rest 35:12 save 9:13 50:24 25:19 14:3,10,19  rest 35:12 save 9:13 58:6 8 37:6,12, 73:20 services 42:8 8ervices 43:24 5:20 44:6,13, retrieved 42:8 school 19:13 73:20 scary 46:4 school 19:13 74:7 80:5 returned 24:8 Sections school 9:6 school 9:6 school 9:15 23 school 9:6 school 9:15 23 school 9:523 school 9:523 school 9:523 school 9:6 school 9:6 school 9:6 school 9:6 school 9:15 23 school 9:6 school 9:	rescued	review 36:17	send 7:17	55:18 75:3
rescues         7:17         13:1,3,4,8,18         47:9,15         61:16           research         8,18         48:3 52:3         sheet 80:4,6           18:12 21:3         rules         4:21         61:14,22         shelter           residue         31:5         rumor         70:20         63:9 73:11         5:23,24           resolved         15:5 41:15         74:4 80:3, 6:1,5,22         7:4 8:1,5, 22           resolved         15:5 41:15         sending         22:2         7:4 8:1,5, 22           respond         4:23         35:3,10         12:21,22, 23         35:3,10         12:21,22, 23           responded         22:6,13         sad 58:24         47:7,13,22         14:3,10,19           response         saliva         30:19         56:12 63:7         18:17,22           response         saliva         30:19         5ense         8:4         27:15           responsibility         30:11         58:6         837:6,12,         29:13,22,           responsibility         30:11         58:6         837:6,12,           restrieve         save         9:13         58:6         837:6,12,           retrieved         44:1,15         520         44:6,13,	30:10 69:2	room 12:24		shebang
research 18:12 21:3 rules 4:21 fesidue 31:5 rumor 70:20 fesolve 37:6 run 8:14 fesolve 37:15 fesolve 37:6 run 8:14 fesolve 37:15 fesolve 37:6 run 8:14 fesolve 37:15 fesolve 37:6 run 8:14 fesolve 37:11 fesolve 37:6 run 8:14 fesolve 37:11 fesolve 39:12 fesolve 37:11 feso	rescues 7:17	13:1,3,4,		_
18:12 21:3       rules 4:21       61:14,22       shelter         residue 31:5       rumor 70:20       63:9 73:11       5:23,24         resolved       15:5 41:15       sending 22:2       7:4 80:3, 6:1,5,22         21:17,20       rumning       sending 22:2       19,22 9:8, 15 10:3         22:14       41:23       34:22       34:21,22, 35:3,10       12:21,22, 39:11,22       23,24 13:8       15:4         responded       22:13       sale 58:24       56:12 63:7       18:17,22       15:4 <t< td=""><td>rogoargh</td><td></td><td></td><td>ghoot 80:4 6</td></t<>	rogoargh			ghoot 80:4 6
residue 31:5 rumor 70:20 63:9 73:11 5:23,24 resolve 37:6 rum 8:14 74:4 80:3, 6:1,5,22 21:17,20 running 22:14 41:23 34:22 15 10:3 respond 4:23		rules 4:21		·
resolve 37:6 run 8:14			•	
resolve 37:6 run 8:14 resolved	residue 31:5	rumor 70:20		•
resolved 21:17,20 22:14 41:23 34:22 35:3,10 22:24,23 5:3 10:24 22:6,13  responded 22:13  responded 22:13  response  22:14	resolve 37:6	run 8:14	•	
21:17,20 running 34:22 15,12:37,2  respond 4:23	resolved	15:5 41:15	20	
22:14     41:23     34:22     13:10:3       respond 4:23     35:3,10     12:21,22,       5:3 10:24     22:6,13     47:7,13,22     14:3,10,19       22:6,13     sad 58:24     56:12 63:7     18:17,22       responded     salem 42:2,3     65:24     19:16 21:8       22:13     saliva 30:19     sense 8:4     27:15       response     saliva 30:19     sense 8:4     27:15       22:14     sammy 25:3     separate     28:12,19       25:13     sanctuary     26:13,17,     29:13,22,       responsibility     30:11     24 27:3,10     24 30:1,3,       73:5     sat 17:7,14     58:6     8 37:6,12,       rest     35:12     save 9:13     58:6     8 37:6,12,       retired 42:8     80:13     74:7,9,12,     40:7,22       retrieve     saved 9:13     served 28:7     23 42:1,3       44:1,15     saving 25:20     5:20     44:6,13,       73:20     scary 46:4     set 7:8     45:11       retrieved     scary 46:4     set 7:8     45:11       returned     scratch 76:8     share 47:22     50:12 51:3       50:12 51:3     53:14,17     55:14,17		runnina	sending 22:2	
respond 4:23 5:3 10:24 22:6,13  responded 22:13  response 22:14 25:13  responsibility 73:5  rest 35:12 50:24 25:19 retired 42:8  retireve 44:1,15 73:20  retrieved 44:7  scoop 15:23  retrieved 44:7  scoop 15:23  retrieved 44:7  scoop 15:23  scoop 15:23  returned 24:8  sections  retrieved 9:6  separate 28:12 27:15 24:20:3  retrieved 42:7  separate 28:12,19 24:27:3,10 24:30:1,3, 24:30:1,3, 24:27:3,10 24:30:1,3, 24:30:1,3, 24:1,7, 24:7,9,12, 41:7,14, 15,18,20, 23:24 41:7,14, 15,18,20, 23:24 25:19  74:7,9,12, 41:7,14, 15,18,20, 23:24 25:19  74:7,9,12, 41:7,14, 15,18,20, 23:42:1,3 42:1,3 42:1,3 42:1,3 43:14 43:10,19 24:20:3 24:1,3 25:12 26:13,17, 29:13,22, 26:13,17, 29:13,22, 24:1,3 20:1,3,10 24:27:15 24:27:16 24:27:15 24:27:15 24:27:15 24:27:15 24:27:15 24:27:15 24:27:15 24:27:15 24:27:16 24:27:16 24:27:16 24:27:16 24:27:16 24:27:16 2	•	=		
5:3 10:24       s       47:7,13,22       14:3,10,19         22:6,13       sad 58:24       54:21       15:4         responded       22:13       salem 42:2,3       65:24       19:16 21:8         22:14       saliva 30:19       sense 8:4       27:15         22:14       sammy 25:3       separate       28:12,19         25:13       sanctuary       26:13,17, 29:13,22,         responsibility       30:11       24 27:3,10       24 30:1,3,         73:5       sat 17:7,14       58:6       8 37:6,12,         rest 35:12       save 9:13       58:6       8 37:6,12,         restrieved       25:19       74:7,9,12,       40:7,22         41:7,14,       15,18,20,       15:20       44:6,13,         retrieved       saving 25:20       5:20       44:6,13,         73:20       scary 46:4       setting 33:6       46:13,16         retrieved       school 19:13       20:4,17       setting 33:6       46:13,16         return 30:7       scoop 15:23       severely       47:21         80:5       scratch 76:8       share 47:22       53:14,17         56:24       5:20       5:20       5:20         70:4:4:4       50:12:5		11 10	•	
22:6,13         sad 58:24         54:21         15:4           responded 22:13         salem 42:2,3         65:24         19:16 21:8           response 22:14         saliva 30:19         sense 8:4         27:15           22:14         sammy 25:3         separate 28:12,19           25:13         sanctuary 26:13,17, 29:13,22,           responsibility 73:5         sat 17:7,14         58:6         8 37:6,12,           rest 35:12 50:24         save 9:13 74:7,9,12, 40:7,22         40:7,22           50:24         25:19 74:7,9,12, 41:7,14,         14 15,18,20,           retrieve 42:8         saved 9:13 services 43:24         5:20 44:6,13,           73:20         scary 46:4 services 5:20 5:20 44:6,13,         5:20 44:6,13,           retrieved 44:7 20:4,17 school 19:13 20:4,17 setting 33:6 5:21 services 7:8 45:11 setting 33:6 46:13,16         46:13,16           returned 24:8 scratch 76:8 scratch 76:8 scratch 76:8 share 47:22 53:14,17         50:12 51:3 53:14,17	_		•	
responded 22:13 salem 42:2,3 65:12 63:7 18:17,22 19:16 21:8 22:14 25:13 sanctuary 25:13 sanctuary 26:13,17, 29:13,22, 24:2 26:3 27:15 sanctuary 26:13,17, 29:13,22, 24:2 27:3,10 24:30:1,3, 73:5 sat 17:7,14 sat 17:7,14 save 9:13 50:24 25:19 retired 42:8 80:13 retrieve 44:1,15 73:20 scary 46:4 retrieved 44:7 school 19:13 20:4,17 scoop 15:23 scretch 76:8 24:8 school 9:6 scretch 76:8 scretch 76:8 school 9:6 scretch 76:8 scretch 76:8 scretch 9:6			47:7,13,22	<i>' '</i>
responded       22:13       salem       42:2,3       65:24       19:16 21:8         response       saliva       30:19       sense       8:4       27:15         22:14       Sammy       25:3       separate       28:12,19         25:13       sanctuary       26:13,17,       29:13,22,         responsibility       30:11       24 27:3,10       24 30:1,3,         73:5       sat       17:7,14       58:6       8 37:6,12,         rest       35:12       save       9:13       september       21 38:3,10         50:24       25:19       74:7,9,12,       40:7,22       41:7,14,       15,18,20,         retrieved       42:8       saving       25:20       services       43:24         73:20       scary       46:4       set       7:8       45:11         retrieved       44:7       school       19:13       setting       33:6       46:13,16         return       30:7       scoop       15:23       severely       47:21         80:5       scratch       76:8       share       47:22       53:14,17         24:8       sections       share       47:22       53:14,17	22:6,13	<b>sad</b> 58:24		
response saliva 30:19 sense 8:4 27:15  22:14 Sammy 25:3 separate 28:12,19  25:13 sanctuary 26:13,17, 29:13,22,  responsibility 30:11 24 27:3,10 24 30:1,3,  73:5 sat 17:7,14 58:6 8 37:6,12,  rest 35:12 save 9:13 September 21 38:3,10  50:24 25:19 74:7,9,12, 40:7,22  41:7,14,  retired 42:8 80:13 14 15,18,20,  retrieve saved 9:13 served 28:7 23 42:1,3  44:1,15 saving 25:20 services 43:24  73:20 scary 46:4 set 7:8 set 15,23  retrieved 44:7 school 19:13 20:4,17 setting 33:6 46:13,16  return 30:7 80:5 scoop 15:23 soverely 47:21  80:5 scatch 76:8 share 47:22 53:14,17  returned 24:8 sections shared 9:6 services 53:14,17	responded	Galam /12:2 2		
response       Saliva       30.19       sense       8:4       27:15         22:14       Sammy       25:3       separate       28:12,19         25:13       sanctuary       26:13,17,       29:13,22,         responsibility       30:11       24 27:3,10       24 30:1,3,         73:5       sat       17:7,14       58:6       8 37:6,12,         rest       35:12       save       9:13       5eptember       21 38:3,10         50:24       25:19       74:7,9,12,       40:7,22       41:7,14,         retired       42:8       80:13       15,18,20,         retrieve       saved       9:13       services       43:24         73:20       scary       46:4       43:24         retrieved       school       19:13       45:11         44:7       school       19:13       46:13,16         return       30:7       scoop       15:23       46:13,16         return       scoop       15:23       60:4       49:3,11         returned       scratch       76:8       76:24       76:24       76:24         24:8       sections       schard       9:6       76:25       76:25 <td>22:13</td> <td></td> <td>65:24</td> <td></td>	22:13		65:24	
22:14 Sammy 25:3 separate 28:12,19 25:13 sanctuary 26:13,17, 29:13,22, responsibility 30:11 24 27:3,10 24 30:1,3, 73:5 sat 17:7,14 58:6 8 37:6,12, rest 35:12 save 9:13 5eptember 21 38:3,10 retired 42:8 80:13 74:7,9,12, retired 42:8 80:13 served 28:7 23 42:1,3 44:1,15 saving 25:20 services 43:24 retrieved 44:7 school 19:13 20:4,17 setting 33:6 46:13,16 return 30:7 80:5 scoop 15:23 severely 60:4 49:3,11 returned 24:8 sections share 47:22 53:14,17	response	saliva 30:19	sense 8:4	
25:13       sanctuary       26:13,17,       29:13,22,         responsibility       30:11       24 27:3,10       24 30:1,3,         73:5       sat 17:7,14       58:6       8 37:6,12,         rest 35:12       save 9:13       September       21 38:3,10         50:24       25:19       74:7,9,12,       40:7,22         retired 42:8       80:13       15,18,20,         retrieve       saved 9:13       served 28:7       23 42:1,3         44:1,15       saving 25:20       services       43:24         73:20       scary 46:4       set 7:8       15,23         retrieved       school 19:13       setting 33:6       46:13,16         44:7       scoop 15:23       severely       47:21         80:5       scoop 15:23       severely       47:21         80:5       scratch 76:8       share 47:22       53:14,17         returned       sections       share 47:22       53:14,17	_	<b>Sammy</b> 25:3	genarate	
responsibility         30:11         24 27:3,10         24 30:1,3,           73:5         sat 17:7,14         58:6         8 37:6,12,           rest 35:12         save 9:13         September         21 38:3,10           50:24         25:19         74:7,9,12,         40:7,22           retired 42:8         80:13         14         15,18,20,           retrieve         saved 9:13         served 28:7         23 42:1,3           44:1,15         saving 25:20         services         43:24           73:20         scary 46:4         set 7:8         15,23           retrieved 44:7         school 19:13         setting 33:6         46:13,16           return 30:7         scoop 15:23         severely 47:21         49:3,11           returned 24:8         scratch 76:8         share 47:22         53:14,17	25:13	gangtuary	_	•
73:5 sat 17:7,14 58:6 8 37:6,12, rest 35:12 save 9:13 74:7,9,12, 14 11:7,14, retired 42:8 80:13 15,18,20, retrieve saved 9:13 served 28:7 23 42:1,3 44:1,15 saving 25:20 5:20 44:6,13, 73:20 scary 46:4 set 7:8 15,23 44:7 20:4,17 setting 33:6 46:13,16 return 30:7 80:5 scoop 15:23 severely 47:21 80:5 scatch 76:8 share 47:22 53:14,17 returned 24:8 sections shared 9:6 55:4		_		
rest 35:12 save 9:13 74:7,9,12, 50:24 25:19 74:7,9,12, 14 15,18,20, retrieve saved 9:13 served 28:7 23 42:1,3 44:1,15 saving 25:20 5:20 44:6,13, 73:20 scary 46:4 set 7:8 15,23 44:7 20:4,17 setting 33:6 46:13,16 return 30:7 80:5 scratch 76:8 served 9:6 56:20 5:21 51:3 24:8 sections spared 9:6 55:4			•	
rest 35:12       save 9:13       september 74:7,9,12, 40:7,22         50:24       25:19       74:7,9,12, 14       41:7,14, 15,18,20, 1	73.5	sat 17:7,14		
50:24       25:19       74.7,9,12,       41:7,14,         retired 42:8       80:13       14       15,18,20,         retrieve       saved 9:13       served 28:7       23 42:1,3         44:1,15       saving 25:20       services       43:24         73:20       scary 46:4       set 7:8       15,23         retrieved 44:7       school 19:13       45:11       45:11         20:4,17       setting 33:6       46:13,16         return 30:7       scoop 15:23       severely 47:21       49:3,11         returned 24:8       scratch 76:8       share 47:22       53:14,17         share 47:22       53:14,17	rest 35:12	<b>save</b> 9:13	_	
retired 42:8 80:13 15,18,20, retrieve saved 9:13 served 28:7 23 42:1,3 44:1,15 saving 25:20 services 43:24 73:20 5:20 44:6,13, retrieved 44:7 school 19:13 setting 33:6 46:13,16 return 30:7 80:5 scoop 15:23 severely 47:21 80:5 scoop 15:23 severely 49:3,11 returned 24:8 sections share 47:22 53:14,17	50:24	25:19		·
retrieve         saved         9:13         served         28:7         23 42:1,3           44:1,15         saving         25:20         43:24           73:20         scary         46:4         5:20         44:6,13,           retrieved         school         19:13         45:11           44:7         school         19:13         46:13,16           return         30:7         scoop         15:23         47:21           80:5         scoop         15:23         49:3,11           returned         scratch         76:8         50:12 51:3           24:8         sections         share         47:22         53:14,17	retired 42:8	80:13	<b>14</b>	
44:1,15       saving 25:20       services       43:24         73:20       5:20       44:6,13,         retrieved       scary 46:4       set 7:8       15,23         44:7       school 19:13       45:11         return 30:7       scoop 15:23       severely       47:21         80:5       scratch 76:8       50:12 51:3         returned       share 47:22       53:14,17         24:8       sections       shared 9:6       55:4		saved 9:13	served 28:7	
73:20  retrieved 44:7  school 19:13 20:4,17  scoop 15:23  scratch 76:8 24:8  saving 25:20 5:20 44:6,13, 15,23 45:11 46:13,16 47:21 50:12 51:3 50:12 51:3 53:14,17  schared 9:6			services	·
retrieved 44:7 school 19:13 20:4,17 setting 33:6 46:13,16 return 30:7 80:5 returned 24:8 school 19:13 coop 15:23 severely 60:4 share 47:22 53:14,17 shared 9:6	•	saving 25:20		
retrieved 44:7 school 19:13 20:4,17 setting 33:6 45:11 46:13,16 47:21 80:5 scoop 15:23 60:4 49:3,11 returned 24:8 sections set 7:8 45:11 50:12 51:3 53:14,17		scary 46:4		
44:7 20:4,17 setting 33:6 46:13,16 return 30:7 80:5 scoop 15:23 60:4 49:3,11 returned 24:8 sections setting 33:6 46:13,16 47:21 50:12 51:3		school 19:12	set /:8	· ·
return 30:7       scoop 15:23       severely 60:4       47:21         returned 24:8       scratch 76:8 share 47:22       50:12 51:3         53:14,17	44:7		setting 33:6	
80:5 scoop 15.23 60:4 49:3,11 50:12 51:3 53:14,17 Sections share 9:6 55:4	<b>return</b> 30:7	·	severely	47:21
returned scratch 76:8 50:12 51:3 53:14,17 54:8 55:4	80:5	<b>scoop</b> 15:23	_	49:3,11
24:8 Sections 53:14,17	returned	scratch 76:8		50:12 51:3
ghared 9:6 FF:4		Sections	snare 4/:22	53:14,17
1	21.0		shared 9:6	55:4
		- <del></del>		

#### **BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS** Christine Link-Owens on 04/10/2015 Index: shelters\_started

	Christine Link-Ov	Index: sheltersstarted	
60:15,16	<b>short</b> 73:8	slander	67:17
61:8	show 23:21	40:21	68:4,7
63:11,22	35:5 61:8	slandering	69:7
64:14,18,		40:20	spaying
24 65:20	<b>shown</b> 74:24		23:18
70:5,17	<b>side</b> 40:16	<b>sleep</b> 53:10	
72:19	52:22	<b>Snoopy</b> 58:24	<b>speak</b> 29:5
73:2,6,22	sign 80:8,	soaking	33:18 75:4
75:1	14	30:24	speaking
77:17,20,			4:24 42:6
24	signature	social 38:5	specific
shelters	79:22 80:3	Society	27:15
18:17,23	<b>signed</b> 75:22	18:24	
19:10	significance	son 54:4,5,	<b>speech</b> 79:21
65:12 69:2	74:14	7	Spike 48:20
sheriff	similar	<b>sort</b> 37:15	<b>spoke</b> 24:24
10:1,15,	15:21,22		25:2 75:15
17,23	17:24	sought	spread 62:19
11:23 14:1	19:15	68:17,20	
16:14	27:15	<b>space</b> 21:8,9	spring 10:6
17:13,17,		53:1,3	stack 56:5
24 22:2,6	single 43:12	spare 30:6	<b>staff</b> 13:12
29:3 32:9	60:20,21	_	14:3 24:24
33:12	sitting	<b>spay</b> 6:3	28:24
37:19	11:14	24:19	37:21
49:11 51:4	63:21	25:13 27:1	70:7,9,14,
64:14	situation	68:15,18	17 71:18,
74:19 76:9	7:18 8:18,	69:12 70:10	22 72:4
77:9 78:8,	20 15:8,22	70:10	73:10,14
10,13 79:6	19:16		74:4 77:11
sheriff's	21:16	spay/neuter	78:20
8:11 43:23	26:18,22	22:10,20	standard
	42:20 69:7	23:20	26:6
Sheryl 41:2 43:1	situations	26:12	
	55:6	27:13,18	started 7:2
shocked		<b>spayed</b> 23:2,	9:10 10:10
50:12	<b>size</b> 15:22	6 24:4,24	11:9 68:24

#### BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS Christine Link-Owens on 04/10/2015 **Index:** starting..testified

	Christine Link-O	wens on 04/10/2015	Index: startingtestified
78:11	Strelka 4:6,	submitted	
starting 6:5	10 12:4,	40:16 57:7	<b>T</b>
	11,15,17	succeed 75:7	tad 71:24
starved	14:15,18,		tau /1·21
13:15	21,23	suggested	taking 15:7
state 5:7	16:16,23	65:19 70:3	talk 34:2
46:15 81:3	27:2,7	<b>Sunday</b> 32:22	59:22
stated 14:1	31:12,19	Supervisors	74:24
25:12	34:7,16,20	17:19 18:1	talked 73:19
47:20	35:21	75:4,10	
72:11	36:3,6,13,	78:18	talking 10:5
	16 46:19		40:13 66:7
statement	47:3	Supervisors'	70:15
45:17	49:17,24	75:2	teaching
statements	51:19 52:2	supplies	19:12 21:3
45:24 72:1	54:20	45:2,11	team 19:14
statutes	55:9,22	supply 45:3	21:2
18:12	56:11,15,		
stay 5:4	20,23	<pre>suppose 71:10</pre>	tears 37:17
_	57:5,15		<b>Tech</b> 5:11
staying	59:21 62:16,22	supposed	19:12
13:17	63:6 65:7	8:17 24:3	20:14
stealing	79:19	37:9 41:22	24:20,21
37:9	80:16,19,	surrender	technically
stepped 6:15		45:12	10:16
	8	surrendered	technician
stick 34:8	-	13:14	21:1
51:16	stressful		
sticker 34:8	37:22	<pre>surrounding 35:15</pre>	telling
<b>stolen</b> 33:24	strike 64:13	36:24 37:2	14:15
stop 65:15	strongly		17:12
	28:21 37:7	suspicious	66:21 72:2
stored 12:23	stuff 30:23	27:17	tells 15:18
13:1,2	38:4	<b>sworn</b> 4:2	ten 52:18
straight		system 9:16	term 41:6
67:4	subject 48:1	36:10	
	53:12		testified

## BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS Christine Link-Owens on 04/10/2015 Index: testifying..understand

	CIII ISUIIC LIIIK-O	wens on 04/10/2015 Ind	ex: testifyingunderstand
4:4 14:10	thirty 16:2	38:19	transport
15:1 24:10	THOMAS 4:6	50:13	30:9
54:11 64:8		53:23 54:1	Transportation
72:3	thought	76:20,23	5:11
testifying	43:10 46:1	title 20:20	
72:14	52:14 62:6	21:2	trouble 43:2
/2.14	70:11	21.2	true 40:23
testimony	three-page	today 11:14	65:22
27:4,9	32:20	33:5 55:24	66:18
77:14		62:7 63:21	
79:23	time 4:23	72:3	trusted
80:10	6:8 7:20	toe 15:11	66:20
text 39:19,	8:6,8,16		truth 4:3,4
23		told 13:17,	40:6 66:21
43	10:5 13:9	20,21	
thick 30:22	17:12	25:14	truthful
thing 5:2	19:17	33:19	4:18
37:8 43:22	22:2,5	44:1,2,5,	turn 15:13
46:12	25:17	20 66:1	turned 16:2
47:10	27:19	67:24 72:5	
53:9,10	28:8,9,20	73:24	Twin 74:16
70:15	29:12	74:6,19,20	two-page
	30:9,24	Tommy 4:9	39:4
things 12:6	31:4 37:3,	<del>-</del>	
18:21	18 40:6,7	top 39:1,17	type 4:22
21:10 30:5	42:15,21	42:10 48:5	15:22 16:1
33:24 37:9	46:4,7	59:24 60:1	types 21:10
38:2,5,20	49:11 51:3	tops 30:12	typical 30:2
40:17	52:22 61:8	_	cypical 50.2
43:8,11	62:2 70:19	tough 37:16	
44:5,6,7,	71:6 72:24	<b>Towers</b> 74:16	<b>U</b>
15 45:4,5,	73:4,8,18	tracking	understand
7 66:2	77:18	26:19	18:5,15
74:7 75:14	80:14	20 · 13	27:21
77:11,16		transcript	29:17 34:3
80:6	timer 21:17,	80:21	52:23 64:3
thimat-	22	transcripts	
thirsty	times 10:21	79:23	66:4 69:1,
15:13,17	13:10		11 72:17

## BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS Christine Link-Owens on 04/10/2016dex: understanding..whatsoever

	Christine Link-O	wens on 04/10/20 <b>165</b> dex: u	nderstandingwhatsoever
80:23	13,24	9:1,2,10,	80:19
understanding	20:14,17,		walk 55:11
22:16,20	18 24:14	12:20	
64:16	52:21	13:7,10,21	wanted 25:9,
	<b>vice</b> 29:7	15:4 17:5,	19 26:18
understood	76:19,24	7 19:2	27:23
25:18		28:4 29:24	32:13
unprofessional	Virginia	30:4 33:22	33:22 34:2
38:13,18	5:11 19:12	37:8,11,23	35:22
44:19	20:14	42:16	37:13
	24:20,21	48:14	41:13,15
updated	47:14	50:11	43:6 45:11
19:18	volunteer	51:12	58:12
<b>uphold</b> 69:10			62:17
<b>upset</b> 52:13		53:5,17,24	wash 30:7
	28:6 33:20		31:1
urine 15:10	37:12,20		
	42:21	64:17,21,	washed 31:2
v	44:3,5,7,	23 65:2	water 15:13,
	15 55:3	66:2,19	14,23
valuable	60:13	67:6 69:10	16:3,4
9:12	72:19	70:21 71:8	30:3,11,
verbally 5:3		70:21 71:8	14,16,18,
_	13.2,1	73:1,6,9,	20 31:4
verified	74:1		
25:1	volunteered	11,12 74:4	week 14:11
<b>verify</b> 55:14	9:10	75:3 77:8	15:1 33:10
66:12,15	18:22,23	78:22 79:2	36:12
<b>vet</b> 8:22	65:12		63:22
20:4 24:5	volunteering	<b>W</b>	weekend 62:7
	65:15	wait 4:23	weeks 71:4
<b>vet's</b> 20:6	73:15		weekS /⊥•4
24:5	13.13	58:11	weighed
veterinarian	volunteerism	59:22	52:17
20:2 23:7	6:16	<b>waive</b> 80:17	welfare 6:3
	volunteers	81:1,3	
veterinary	6:22 7:3,	waived 27:24	whatsoever
18:15,19	24 8:4,6,		72:6
19:11,12,	9,10,14,18	waiving	
	, , , , ==		

## BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS **Christine Link-Owens on 04/10/2015 Index: white..young**